1 2 3 4 5 6 7 8 9 10	WILMER CUTLER PICKERING HALE AND DORR LLP SONAL N. MEHTA (SBN 222086) Sonal.Mehta@wilmerhale.com 2600 El Camino Real, Suite 400 Palo Alto, California 94306 Telephone: (650) 858-6000 DAVID Z. GRINGER (pro hac vice) David.Gringer@wilmerhale.com ROSS E. FIRSENBAUM (pro hac vice) Ross.Firsenbaum@wilmerhale.com RYAN CHABOT (pro hac vice) Ryan.Chabot@wilmerhale.com PAUL VANDERSLICE (pro hac vice) Paul.Vanderslice@wilmerhale.com 7 World Trade Center 250 Greenwich Street New York, New York, 10007	ARI HOLTZBLATT (SBN 354631) Ari.Holtzblatt@wilmerhale.com MOLLY M. JENNINGS (pro hac vice) Molly.Jennings@wilmerhale.com 2100 Pennsylvania Ave NW Washington, DC 20037 Telephone: (202) 663-6000 MICHAELA P. SEWALL (pro hac vice) Michaela.Sewall@wilmerhale.com 60 State Street Boston, Massachusetts 02109 Telephone: (617) 526-6000
12	New York, New York 10007 Telephone: (212) 230-8800	
13	Attorneys for Defendant Meta Platforms, Inc.	
14		
15	UNITED STATES	DISTRICT COURT
16	NORTHERN DISTRI	ICT OF CALIFORNIA
17	SAN FRANCI	SCO DIVISION
18	MAXIMILIAN KLEIN, et al., on behalf of themselves and all others similarly situated,	Case No. 3:20-cv-08570-JD
19 20	Plaintiffs,	DECLARATION OF AMRISH ACHARYA IN SUPPORT OF OMNIBUS
21	V. META DI ATEODMS, INC. a Dalayyara	MOTION TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY HIDCMENT AND DAUBERT
22	META PLATFORMS, INC., a Delaware Corporation headquartered in California,	SUMMARY JUDGMENT AND DAUBERT BRIEFING IN THE ADVERTISER CASE
23	Defendant.	Judge: Hon. James Donato
24		
25		
26		
27	N- 2:20 09570 ID	DECL OF AMBIGUACHARYA ICO OMBURUC
28	No. 3:20-cv-08570-JD	DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN

CONNECTION WITH SUMMARY JUDGMENT

AND DAUBERT BRIEFING

- 1. I, Amrish Acharya, declare as follows:
- 2. I am a Director of Finance at Meta Platforms, Inc. I have been employed by Meta since 2015 and have held my current title since 2021. Over the course of my employment at Meta, I have acquired personal knowledge of Meta's practices and procedures concerning the maintenance of the confidentiality of its strategic, business, financial, technical, and marketing information.
- 3. I respectfully submit this declaration in support of the Omnibus Motion to Seal Materials Submitted in Connection with the Summary Judgment and *Daubert* Briefing in the Advertiser case ("Sealing Motion"), filed on March 14, 2025 in *Klein v. Meta Platforms, Inc.*, Case No. 3:20-cv-08570-JD (N.D. Cal.).
- 4. The facts set forth in this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge of Meta's policies and practices as they relate to the treatment of confidential information, materials that were provided to me and reviewed by me, or conversations with other knowledgeable employees of Meta. If called upon as a witness in this action, I could and would testify from my personal knowledge and knowledge acquired from sources with factual foundation.
- 5. All the material for which Meta requests sealing is maintained as highly confidential. To the best of my knowledge, none of this material has been publicly disclosed. As demonstrated with factual particularity below, there are compelling reasons and good cause to seal Meta's highly confidential materials.
- 6. For the reasons stated below, this information is highly sensitive, and if publicly disclosed, could significantly prejudice Meta's competitive position by harming Meta's relationships with business partners, developers, and advertisers, putting Meta at unfair disadvantage in future business negotiations, and permitting Meta's competitors to gain an unfair advantage in competition with Meta. For example, the public disclosure of Meta's internal, confidential material could reveal Meta's strategic decision-making and influence the business strategies employed by Meta's competitors by enabling them to mimic Meta's confidential

strategies in an effort to attract users or advertisers away from Meta. The disclosure of Meta's confidential material might also give a competitor or a potential business partner unfair leverage in competing against or negotiating with Meta.

- 7. As a matter of internal policy, Meta and its employees treat as strictly confidential: (1) nonpublic business dealings with third parties, including details of negotiation strategies or specific deal terms; (2) nonpublic financial data or information; (3) nonpublic pricing data or information; (4) nonpublic technical functionality of Meta's products and systems; (5) internal research or analyses, including proprietary methods for conducting that research or analysis; (6) nonpublic business strategies, including internal analyses or discussions of in-development or unreleased products, features, or future plans; and (7) other sensitive information that, if publicly disclosed, could prejudice Meta's business interests. In my experience and to the best of my knowledge, Meta does not disclose internal documents, data, or information of this nature outside of the company, except to authorized third parties when so required or permitted by law or contract.
- 8. The specific information Meta seeks to seal is identified in the tables below, with numbered rows for the Court's ease of reference:

-2-

1 2	Row No.	Dkt. No.	Document or Portion of Document Sought to Be Sealed, If Applicable	Basis for Sealing
3	Defen			on and Motion For Summary Judgment dvertiser Class Action Complaint
4 5 6 7 8 9 10 11	1	874-1	18:8-9, between "quid proquo—were" and "and that he had 'no basis to believe that"	This text describes confidential, non-public financial strategy discussions. If revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
12 13 14 15 16 17 18 19	2	874-1	18:9, between "pulling back from its" and "investment in premium"	This text contains non-public and confidential information regarding the financial performance of a particular feature of Meta's offerings. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making and internal characterizations and assessments which, for example, could give other parties insights in the performance of Meta's business that could be used to gain an unfair advantage against Meta.
20 21 22				

24

25

26

11		
Descripto Forcelos a ID. A07DEE7D 404E 4DCE 0E90 70E000D00004		
Docusign Envelope ID: CARSE 3B 2045 4 B 6 5 9 5 7 9 7 5 6 8 C D 6 8 3 3 4 4 5 4 8 6 5 9 5 7 9 7 5 6 8 C D 6 8 3 3 4 4 5 4 8 6 5 9 5 7 9 7 5 6 8 C D 6 8 3 3 4 4 5 6 5 9 5 7 9 7 5 6 8 C D 6 8 3 3 4 4 5 6 5 9 5 7 9 7 5 6 8 C D 6 8 3 3 4 4 5 6 5 9 5 7 9 7 5 6 8 C D 6 8 3 3 4 4 5 6 5 9 5 7 9 7 5 6 8 C D 6 8 3 3 4 4 5 6 5 9 5 7 9 7 5 6 8 C D 6 8 3 3 4 4 5 6 5 6 8 C D 6 8 C D 6 8 3 3 4 4 5 6 5 6 8 C D	Filed 03/14/25	D E - £ 101
Processing and the second of t		ואו זה א מהפט
Gase 3.20-07-00370-3D D00u11e111 303-1	1 11CU US/14/23	Lane 2 OLTOT

3	874-1	18:25, between "own analysis	This text contains non-public and
		shows that the" and "allegedly	confidential information regarding the
		at issue in this agreement"	advertising spend of a particular advertiser. Disclosure of this non-public
			information is likely to result in
			competitive harm to Meta, as it reveals
			strategic decision-making which, for
			example, could give an advertiser unfair
			leverage in competing against or
			negotiating with Meta. Moreover, Meta
			competitors could use this non-party
			information to unfairly target Meta's
			advertisers and offer specific deal terms
			designed to undercut those offered by
			Meta. That advertiser likely also has a
			reasonable expectation Meta will
			maintain the confidentiality of this
			information.
4	874-1	19:28, between "claim	This information reflects and is
		accounted for just" and "of	calculated from internal, non-public Me
		Meta's Class Period"	financial data. Were this information to
			be publicly revealed, it could cause Met
			competitive harm by giving competitors
			insight into confidential Meta financial
			information.
			on and Motion For Summary Judgmen
_			iser Class Action Complaint, Exhibit 1
5			A. Williams, Ph.D., dated Aug. 5, 2024 This information reflects and is
3	874-2	26 ¶ 59, between "FAN accounts for" and "of	
			calculated from internal, non-public Me financial data. Were this information to
		Facebook's advertising revenues"	be publicly revealed, it could cause Met
		Tevenues	competitive harm by giving competitors
			insight into confidential Meta financial
			information.

-4-

1	6	874-2	38 ¶ 94, between "2013 presentation notes that the"	This information reflects and is calculated from internal, non-public Meta
2			and "was generated from local;" between	financial data. Were this information to be publicly revealed, it could cause Meta
3			"unsophisticated brands" and	competitive harm by giving competitors
4			"developers and sophisticated brands;" between "developers	insight into confidential Meta financial information.
5			and sophisticated brands" and "marketers requiring	
6			advanced features;" between "marketers requiring	
7			advanced features" and "local	
8			business;" and after "local business"	
9				on and Motion For Summary Judgment
10				iser Class Action Complaint, Exhibit 5, man Klumpp, held on Mar. 5, 2024
	7	874-6	289:7, between "irrational for	This information reflects and is
11			Facebook to" and "in to	calculated from internal, non-public Meta
12			make that decision"	financial data. Were this information to be publicly revealed, it could cause Meta
13				competitive harm by giving competitors
14				insight into confidential Meta financial
	Dofon	dant Mata I	 Platforms Inc 's Notice of Moti	information. on and Motion For Summary Judgment
15				iser Class Action Complaint, Exhibit 6,
16				Klumpp, Ph.D., dated Jan. 12, 2024
17	8	874-7	77 ¶ 151, between "others at Facebook, writing:" and "In	This information contains non-public information regarding Meta's
18			the same e-mail, Ms. Chang	confidential non-public internal strategic
			advised that;" between "In the	considerations related to creating value
19			same e-mail, Ms. Chang advised that" and "Ms. Chang	for and attracting users or advertisers to Meta's products or services. This
20			testified that;" and after	information has never been disclosed
21			"Zuckerberg on April 30, 2014"	publicly. Disclosure of this information would adversely impact Meta's current
22				competitive position by enabling Meta's
				competitors to mimic its confidential
23				strategies in an effort to attract users or advertisers away from Meta.
24				
25				

No. 3:20-cv-08570-JD

26

27

9	874-7	79-80 ¶ 157, after "— expressly addresses"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.
10	874-7	80 ¶ 158, after "Microsoft agreed as follows:"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.

-6-

No. 3:20-cv-08570-JD

1	11	874-7	80 ¶ 158 n.353, before "PALM-008914036-056"	This text contains confidential, non-
2			PALMI-008914030-030	public information regarding a non-party developer, advertiser, or business partner
2				and implicates their confidentiality
3				interests, by revealing the identity of a
4				Meta developer, advertiser, or business
4				partner who is not party to this litigation,
5				and who has a reasonable expectation that Meta will maintain the
6				confidentiality of contractual terms and
_				its own confidential statements made
7				during negotiations. Further, disclosure
8				of this non-public information is likely to result in competitive harm to Meta, as it
9				reveals strategic decision-making, which,
				for example, could give a competitor or
10				potential business partner unfair leverage
11				in competing against or negotiating with Meta. Moreover, Meta's competitors
10				could use this non-party information to
12				unfairly target Meta's developer,
13				advertiser, or business partner.
1.4	12	874-7	81 ¶ 159, between "Microsoft	This text contains confidential, non-
14			agreed to" and "With this agreement in place"	public information regarding a non-party developer, advertiser, or business partner
15			agreement in place	and implicates their confidentiality
16				interests, by revealing the identity of a
10				Meta developer, advertiser, or business
17				partner who is not party to this litigation, and who has a reasonable expectation
18				that Meta will maintain the
19				confidentiality of contractual terms and
				its own confidential statements made during negotiations. Further, disclosure
20				of this non-public information is likely to
21				result in competitive harm to Meta, as it
22				reveals strategic decision-making, which,
22				for example, could give a competitor or potential business partner unfair leverage
23				in competing against or negotiating with
24				Meta. Moreover, Meta's competitors
24			1	
				could use this non-party information to
25				unfairly target Meta's developer, advertiser, or business partner.

-7-

27

13	874-7	82 ¶ 164 n.357, between "a January 28, 2015" and "(See PALM-007633377-379.)"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.
14	874-7	82-83 ¶ 165 n.358, between "following termination provision:" and "(See PALM-002014487-535"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.

 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

1	15	874-7	84 ¶ 167 n.360, between "at 266" and "PALM-ADI-	This text contains confidential, non-public information regarding a non-party
2			0001000836-837"	developer, advertiser, or business partner and implicates their confidentiality
3				interests, by revealing the identity of a
4				Meta developer, advertiser, or business partner who is not party to this litigation,
5				and who has a reasonable expectation that Meta will maintain the
6				confidentiality of contractual terms and
7				its own confidential statements made during negotiations. Further, disclosure
8				of this non-public information is likely to result in competitive harm to Meta, as it
9				reveals strategic decision-making, which,
10				for example, could give a competitor or potential business partner unfair leverage
11				in competing against or negotiating with Meta. Moreover, Meta's competitors
12				could use this non-party information to unfairly target Meta's developer,
13				advertiser, or business partner.
14	16	874-7	84-85 ¶ 169 n. 361, between "internal Facebook email	This information contains non-public information regarding Meta's
15			describing" and "Bell, K. (January 25;" and after	confidential non-public internal strategic considerations related to creating value
16			"PALM-FTC-00968368"	for and attracting users or advertisers to
17				Meta's products or services. This information has never been disclosed
18				publicly. Disclosure of this information would adversely impact Meta's current
19				competitive position by enabling Meta's
20				competitors to mimic its confidential strategies in an effort to attract users or
				advertisers away from Meta.
21				

23

24

25

26

1.				
1	17	874-7	85-86 ¶ 170, between "Directors presentation noted	This information contains non-public information regarding Meta's
2			that" and image of "2019	confidential non-public internal strategic
3			Product Strategy"	considerations related to creating value for and attracting users or advertisers to
4				Meta's products or services. This information has never been disclosed
5				publicly. Disclosure of this information
6				would adversely impact Meta's current competitive position by enabling Meta's
7				competitors to mimic its confidential strategies in an effort to attract users or
8				advertisers away from Meta.
9	18	874-7	85-86 ¶ 170, image snip between "and social	This information contains non-public information regarding Meta's
10			infrastructure." and "Source: PALM-FTC-00968366-404"	confidential non-public internal strategic
			FALM-F1C-00908300-404	considerations related to creating value for and attracting users or advertisers to
11				Meta's products or services. This
12				information has never been disclosed publicly. Disclosure of this information
13				would adversely impact Meta's current
14				competitive position by enabling Meta's competitors to mimic its confidential
15				strategies in an effort to attract users or
	19	874-7	85-86 ¶ 170 n.364, after "see	advertisers away from Meta. This information contains non-public
16		0717	PALM-FTC-00967935), at	information regarding Meta's
17			366"	confidential non-public internal strategic considerations related to creating value
18				for and attracting users or advertisers to
19				Meta's products or services. This information has never been disclosed
20				publicly. Disclosure of this information
21				would adversely impact Meta's current competitive position by enabling Meta's
				competitors to mimic its confidential
22				strategies in an effort to attract users or advertisers away from Meta.
23		<u> </u>		advertisers away from Meta.

28 $\frac{1}{\text{No. } 3:20\text{-cv-}08570\text{-JD}}$

24

25

26

1 2	20	874-7	87-88 ¶ 173, image between "MARCH 2019" and "Source: PALM-006189416-420"	This information contains non-public information regarding Meta's confidential non-public internal strategic
2				considerations related to creating value
3				for and attracting users or advertisers to
4				Meta's products or services. This
7				information has never been disclosed
5				publicly. Disclosure of this information would adversely impact Meta's current
6				competitive position by enabling Meta's
				competitors to mimic its confidential
7				strategies in an effort to attract users or
8				advertisers away from Meta.
8				on and Motion For Summary Judgment
9	_			ser Class Action Complaint, Exhibit 10,
10	21	874-11	239:15-18, between "he	This information contains non-public
10	21	0/4-11	would like to get." and "These	information regarding Meta's
11			are things that"	confidential non-public internal strategic
12				considerations related to creating value
				for and attracting users or advertisers to
13				Meta's products or services. This
14				information has never been disclosed
				publicly. Disclosure of this information would adversely impact Meta's current
15				competitive position by enabling Meta's
16				competitors to mimic its confidential
				strategies in an effort to attract users or
17				advertisers away from Meta.
18				Iotion and Motion to Exclude Expert
	1 es		eport of Michael A. Williams, F	Exhibit 1, Excerpts of Expert Merits Ph.D., dated Aug. 5, 2024
19	22	876-2	38 ¶ 94, between "2013	This information reflects and is
20			presentation notes that the"	calculated from internal, non-public Meta
21			and "was generated from	financial data. Were this information to
21			local;" between	be publicly revealed, it could cause Meta
22			"unsophisticated brands" and	competitive harm by giving competitors
22			"developers and sophisticated brands;" between "developers	insight into confidential Meta financial information.
23			and sophisticated brands" and	information.
24			"marketers requiring	
25			advanced features;" between	
25			"marketers requiring	
26			advanced features" and "local	
27			business;" and after "local business"	
27	L	<u> </u>	Gusiness	

-11-

1		Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Michael Williams, Exhibit 4, Excerpts of Transcript of					
2	105	Deposition of Scott Fasser, held on Sept. 7, 2023					
3 4 5 6 7 8 9 10 11 12 13	23	876-5	181:9, between "I only reviewed the" and "agreements."	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.			
14				Notion and Motion to Exclude Expert			
	Testim	ony and Op	pinions of Tilman Klumpp, Ext of Tilman Klumpp, Ph.D., (nibit 1, Excerpts of Expert Merits Report dated Jan. 12, 2024			
15 16 17 18 19 20 21 22	24	878-2	77 ¶ 151, between "others at Facebook, writing:" and "In the same e-mail, Ms. Chang advised that;" between "In the same e-mail, Ms. Chang advised that" and "Ms. Chang testified that;" and after "Zuckerberg on April 30, 2014"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.			
23 24							

26

25	878-2	70 90 ¶ 157 of an "	This taxt contains confidential non
23	0/0-2	79-80 ¶ 157, after "— expressly addresses"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.
26	878-2	80 ¶ 158, after "Microsoft agreed as follows:"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates their confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.

No. 3:20-cv-08570-JD

1	27	878-2	80 ¶ 158 n.353, before	This text contains confidential, non-
			"PALM-008914036-056"	public information regarding a non-party developer, advertiser, or business partner
2				and implicates their confidentiality
3				interests, by revealing the identity of a
4				Meta developer, advertiser, or business
4				partner who is not party to this litigation,
5				and who has a reasonable expectation that Meta will maintain the
6				confidentiality of contractual terms and
0				its own confidential statements made
7				during negotiations. Further, disclosure
8				of this non-public information is likely to
0				result in competitive harm to Meta, as it
9				reveals strategic decision-making, which, for example, could give a competitor or
10				potential business partner unfair leverage
10				in competing against or negotiating with
11				Meta. Moreover, Meta's competitors
12				could use this non-party information to
				unfairly target Meta's developer, advertiser, or business partner.
13	28	878-2	81 ¶ 159, between "Microsoft	This text contains confidential, non-
14		070-2	agreed to" and "With this	public information regarding a non-party
			agreement in place"	developer, advertiser, or business partner
15				and implicates their confidentiality
16				interests, by revealing the identity of a
				Meta developer, advertiser, or business
17				partner who is not party to this litigation, and who has a reasonable expectation
18				that Meta will maintain the
10				confidentiality of contractual terms and
19				its own confidential statements made
20				during negotiations. Further, disclosure of this non-public information is likely to
21				result in competitive harm to Meta, as it
21				reveals strategic decision-making, which,
22				for example, could give a competitor or
23				potential business partner unfair leverage
				in competing against or negotiating with Meta. Moreover, Meta's competitors
24				could use this non-party information to
25				unfairly target Meta's developer,
				advertiser, or business partner.
26				

1	29	878-2	82 ¶ 164 n.357, between "a January 28, 2015" and "(See	This text contains non-public and confidential information regarding
2			PALM-007633377-379.)"	Meta's agreements with a non-party
				developer, advertiser, or business partner
3				as well as internal strategy relating to those agreements. Disclosure of this non-
4				public information is likely to result in
5				competitive harm to Meta, as it reveals
6				strategic decision-making which, for example, could give a developer,
				advertiser, or business partner unfair
7				leverage in competing against or
8				negotiating with Meta. Moreover, Meta's competitors could use this non-party
9				information to unfairly target Meta's
				developers, advertisers, or business
10				partners and offer specific deal terms designed to undercut those offered by
11				Meta.
12	30	878-2	82-83 ¶ 165 n.358, between	This text contains confidential, non-
13			"following termination provision:" and "(See PALM-	public information regarding a non-party developer, advertiser, or business partner
13			002014487-535"	and implicates their confidentiality
14				interests, by revealing the identity of a
15				Meta developer, advertiser, or business partner who is not party to this litigation,
16				and who has a reasonable expectation
				that Meta will maintain the confidentiality of contractual terms and
17				its own confidential statements made
18				during negotiations. Further, disclosure
19				of this non-public information is likely to result in competitive harm to Meta, as it
20				reveals strategic decision-making, which,
				for example, could give a competitor or
21				potential business partner unfair leverage in competing against or negotiating with
22				Meta. Moreover, Meta's competitors
23				could use this non-party information to
24				unfairly target Meta's developer, advertiser, or business partner.
			1	
25				

1	31	878-2	84 ¶ 167 n.360, between "at 266" and "PALM-ADI-	This text contains confidential, non-public information regarding a non-party
2			0001000836-837"	developer, advertiser, or business partner
3				and implicates their confidentiality interests, by revealing the identity of a
4				Meta developer, advertiser, or business partner who is not party to this litigation,
5				and who has a reasonable expectation
				that Meta will maintain the
6				confidentiality of contractual terms and its own confidential statements made
7				during negotiations. Further, disclosure
8				of this non-public information is likely to result in competitive harm to Meta, as it
9				reveals strategic decision-making, which, for example, could give a competitor or
10				potential business partner unfair leverage
11				in competing against or negotiating with Meta. Moreover, Meta's competitors
12				could use this non-party information to
12				unfairly target Meta's developer, advertiser, or business partner.
13	32	878-2	84-85 ¶ 169 n. 361, between	This information contains non-public
14			"internal Facebook email	information regarding Meta's
15			describing" and "Bell, K. (January 25;" and after	confidential non-public internal strategic considerations related to creating value
16			"PALM-FTC-00968368"	for and attracting users or advertisers to
1.7				Meta's products or services. This information has never been disclosed
17				publicly. Disclosure of this information
18				would adversely impact Meta's current
19				competitive position by enabling Meta's competitors to mimic its confidential
20				strategies in an effort to attract users or
20				advertisers away from Meta.
21				

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

22

23

24

25

26

1 2 3 4 5 6 7	33	878-2	85-86 ¶ 170, between "Directors presentation noted that" and image of "2019 Product Strategy"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
9	34	878-2	85-86 ¶ 170, image snip between "and social	This information contains non-public information regarding Meta's
10			infrastructure." and "Source: PALM-FTC-00968366-404"	confidential non-public internal strategic considerations related to creating value
11				for and attracting users or advertisers to Meta's products or services. This
12				information has never been disclosed
13				publicly. Disclosure of this information would adversely impact Meta's current
14				competitive position by enabling Meta's competitors to mimic its confidential
15				strategies in an effort to attract users or advertisers away from Meta.
16	35	878-2	85-86 ¶ 170 n.364, after "see PALM-FTC-00967935), at	This information contains non-public information regarding Meta's
17			366"	confidential non-public internal strategic
18				considerations related to creating value for and attracting users or advertisers to
19				Meta's products or services. This information has never been disclosed
20				publicly. Disclosure of this information would adversely impact Meta's current
21				competitive position by enabling Meta's
22				competitors to mimic its confidential strategies in an effort to attract users or
23				advertisers away from Meta.
	1			

-17-

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

24

25

26

1 2 3 4 5 6 7	36	878-2	87-88 ¶ 173, image between "MARCH 2019" and "Source: PALM-006189416-420"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
8	De	fendant Me	ta Platforms, Inc.'s Notice of M	lotion and Motion to Exclude Expert
9			d Opinions of Tilman Klumpp,	Exhibit 2, Excerpts of Transcript of
10	37	878-3	Deposition of Tilman Klumpp 289:7, between "irrational for	This information reflects and is
11 12	37	676-3	Facebook to" and "in to make that decision"	calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors
13 14				insight into confidential Meta financial information.
15				
16				
17				
18 19				
20				
21				
22				
23				

25

26

27

1	Defendant Meta Platforms, Inc.'s Notice of Motion and Motion to Exclude Expert Testimony and Opinions of Markus Jakobsson, Exhibit 1, Excerpts of Expert Merits				
2	1 est		Opinions of Markus Jakobsson, Pl eport of Markus Jakobsson, Pl		
3 4 5	38	880-2	20-21 ¶ 57, between "had developed a so called" and "architecture in which Onavoinstalled;" between "so that Onavo's" and "As a Facebook	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app	
6			engineer explained;" and after "and Ken Rudin:"	performance data and competitive analysis, including proprietary methods	
7				for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for	
8				conducting market research. This information has never been disclosed	
10				publicly and Meta's product team treats it as strictly confidential. If publicly	
11				revealed, this information could influence the competitive decision-making and	
12				business strategies employed by Meta's competitors, for example by influencing	
13 14				how those competitors conduct market research and how they distinguish themselves from Meta. This information	
15				contains nonpublic and confidential research regarding competitive analysis.	
16				This information has never been disclosed publicly and Meta's product	
17				team treats it as strictly confidential. If publicly revealed, this information could	
18 19				influence the competitive decision- making and business strategies employed	
20				by Meta's competitors, for example by influencing how those competitors conduct market research and how they	
21				distinguish themselves from Meta.	
22					
23					
24					
25 26					
20					

1	39	880-2	22 ¶ 60, after "behavioral	This text details the strategy and
1			information such as"	proprietary sources and methods for
2				gathering market research. This
				information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
.				analysis, including proprietary methods
5				for obtaining that data or conducting that research, and proprietary, confidential
				research into potential methodologies for
6				conducting market research. This
7				information has never been disclosed
,				publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
				research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product team treats it as strictly confidential. If
13				publicly revealed, this information could
16				influence the competitive decision-
1.7				making and business strategies employed
17				by Meta's competitors, for example by
18				influencing how those competitors
				conduct market research and how they
19				distinguish themselves from Meta.
20		<u> </u>		
20				
2.1	1			

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

21

22

23

24

25

26

1	40	880-2	24 ¶ 68, between "specific in-	This text details the strategy and
			app analytics—" and "—that	proprietary sources and methods for
2			he believed would"	gathering market research. This
3				information contains nonpublic and confidential research regarding app
3				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that
6				research, and proprietary, confidential research into potential methodologies for
7				conducting market research. This information has never been disclosed
3				publicly and Meta's product team treats it as strictly confidential. If publicly
9				revealed, this information could influence
'				the competitive decision-making and
)				business strategies employed by Meta's
				competitors, for example by influencing
.				how those competitors conduct market
				research and how they distinguish
				themselves from Meta. This information
				contains nonpublic and confidential
				research regarding competitive analysis. This information has never been
				disclosed publicly and Meta's product
				team treats it as strictly confidential. If
				publicly revealed, this information could
				influence the competitive decision-
				making and business strategies employed
				by Meta's competitors, for example by
				influencing how those competitors
				conduct market research and how they
				distinguish themselves from Meta.
,				
l				

23

24

25

26

1	41	880-2	24-25 ¶ 68, image snip	This text details the strategy and
2			between "figure out how to do this" and "PX 2255 at PALM-	proprietary sources and methods for gathering market research. This
			016564836"	information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive analysis, including proprietary methods
5				for obtaining that data or conducting that
				research, and proprietary, confidential
6				research into potential methodologies for conducting market research. This
7				information has never been disclosed
8				publicly and Meta's product team treats it
				as strictly confidential. If publicly revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
11				competitors, for example by influencing how those competitors conduct market
				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential research regarding competitive analysis.
14				This information has never been
				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could influence the competitive decision-
17				making and business strategies employed
				by Meta's competitors, for example by
18				influencing how those competitors conduct market research and how they
19				distinguish themselves from Meta.
20		•		
21				
22				
23				
24				
25				

27

1	42	880-2	25-26 ¶ 70, between "URLs	This text details the strategy and
-			are unfortunately	proprietary sources and methods for
2			uninformative." and "That	gathering market research. This
2			said—we are"	information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
7				analysis, including proprietary methods
5				for obtaining that data or conducting that research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This information has never been disclosed
8				publicly and Meta's product team treats it
0				as strictly confidential. If publicly
9				revealed, this information could influence
4.0				the competitive decision-making and
10				business strategies employed by Meta's
11				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish themselves from Meta. This information
13				contains nonpublic and confidential
14				research regarding competitive analysis. This information has never been
				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could
10				influence the competitive decision-
17				making and business strategies employed by Meta's competitors, for example by
18				influencing how those competitors
10				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
22				

24

25

26

1	43	880-2	35 ¶ 94, image between "companies' valuable	This text details the strategy and proprietary sources and methods for
2			analytics." and "PX 414 at 6"	gathering market research. This
				information contains nonpublic and
3				confidential research regarding app
				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that research, and proprietary, confidential
6				research into potential methodologies for
0				conducting market research. This
7				information has never been disclosed
				publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
				the competitive decision-making and
10				business strategies employed by Meta's
				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
1.4				research regarding competitive analysis. This information has never been
14				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
				publicly revealed, this information could
16				influence the competitive decision-
17				making and business strategies employed
1 /				by Meta's competitors, for example by
18				influencing how those competitors
				conduct market research and how they
19				distinguish themselves from Meta.
20				
20				
21				

23

24

25

26

1	44	880-2	48 ¶ 125, image snip between	This text details the strategy and
			""a good job there." and "PX 1747 at PALM-017114236"	proprietary sources and methods for gathering market research. This
2			1/4/ at 1 ALWI-01/114230	information contains nonpublic and
3				confidential research regarding app
5				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This information has never been disclosed
8				publicly and Meta's product team treats it as strictly confidential. If publicly
9				revealed, this information could influence
				the competitive decision-making and
10				business strategies employed by Meta's
1.1				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish themselves from Meta. This information
13				contains nonpublic and confidential research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product team treats it as strictly confidential. If
16				publicly revealed, this information could
17				influence the competitive decision- making and business strategies employed
18				by Meta's competitors, for example by influencing how those competitors
10				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
22				

28 No. 3:20-cv-08570-JD

23

24

25

26

1	45	880-2	50 ¶ 129, image snip between "Sending message" and "We	This text details the strategy and
			used it to measure"	proprietary sources and methods for gathering market research. This
2			used it to measure	information contains nonpublic and
3				confidential research regarding app
				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that
				research, and proprietary, confidential
6				research into potential methodologies for conducting market research. This
7				information has never been disclosed
,				publicly and Meta's product team treats it
8				as strictly confidential. If publicly
				revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
				research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product
13				team treats it as strictly confidential. If
16				publicly revealed, this information could influence the competitive decision-
				making and business strategies employed
17				by Meta's competitors, for example by
18				influencing how those competitors
10				conduct market research and how they
19				distinguish themselves from Meta.
20		1	- 1	
20				
21				

23

24

25

26

1	46	880-2	52-53 ¶ 133, between	This text details the strategy and
			"Amazon Ads metrics including" and "PX 2256 at	proprietary sources and methods for gathering market research. This
2			PALM-012863801 (Jan. 2019	information contains nonpublic and
3			IAAP Technical Analysis),"	confidential research regarding app
4			encompassing image; and image between "PX 2256 at	performance data and competitive analysis, including proprietary methods
5			PALM-012863801 (Jan. 2019	for obtaining that data or conducting that
6			IAAP Technical Analysis)" and "PX 1208 at PALM-	research, and proprietary, confidential research into potential methodologies for
			014364032-33"	conducting market research. This
7				information has never been disclosed publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence the competitive decision-making and
10				business strategies employed by Meta's competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish themselves from Meta. This information
13				contains nonpublic and confidential research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product team treats it as strictly confidential. If
16				publicly revealed, this information could influence the competitive decision-
17				making and business strategies employed
18				by Meta's competitors, for example by influencing how those competitors
19				conduct market research and how they distinguish themselves from Meta.
20				
21				
22				
23				
24				
25				
26				
27				

1	47	880-2	53 ¶ 134, between "YouTube, including" and image beginning "YouTube what	This text details the strategy and proprietary sources and methods for gathering market research. This
2			data is sent back;" and image	information contains nonpublic and
3			snip between "video_type (ad or content)" and "PX 2256 at	confidential research regarding app performance data and competitive
5			PALM-012863800 (Jan. 2019 IAAP Technical Analysis)"	analysis, including proprietary methods for obtaining that data or conducting that
			•	research, and proprietary, confidential research into potential methodologies for
6 7				conducting market research. This information has never been disclosed
8				publicly and Meta's product team treats it
9				as strictly confidential. If publicly revealed, this information could influence
10				the competitive decision-making and business strategies employed by Meta's
11				competitors, for example by influencing how those competitors conduct market
12				research and how they distinguish
13				themselves from Meta. This information contains nonpublic and confidential
14				research regarding competitive analysis. This information has never been
15				disclosed publicly and Meta's product team treats it as strictly confidential. If
16				publicly revealed, this information could influence the competitive decision-
17				making and business strategies employed
18				by Meta's competitors, for example by influencing how those competitors
19				conduct market research and how they distinguish themselves from Meta.
20				
21				
22				
23				
24				
25				
26				
27				

$_{1}$	48	880-2	54-55 ¶ 138, image between	This text details the strategy and
			"PALM-016895582 at 5584-	proprietary sources and methods for
2			85" and "Id. at PALM-	gathering market research. This
,			016895585"	information contains nonpublic and
				confidential research regarding app performance data and competitive
				analysis, including proprietary methods
				for obtaining that data or conducting that research, and proprietary, confidential
				research into potential methodologies for
				conducting market research. This information has never been disclosed
				publicly and Meta's product team treats it as strictly confidential. If publicly
				revealed, this information could influence
				the competitive decision-making and
				business strategies employed by Meta's
				competitors, for example by influencing
				how those competitors conduct market research and how they distinguish
				themselves from Meta. This information
				contains nonpublic and confidential
				research regarding competitive analysis.
				This information has never been
				disclosed publicly and Meta's product
				team treats it as strictly confidential. If
				publicly revealed, this information could
				influence the competitive decision-
				making and business strategies employed
				by Meta's competitors, for example by influencing how those competitors
				conduct market research and how they
				distinguish themselves from Meta.
_		-1	1	, 5
l				

28 No. 3:20-cv-08570-JD

22

23

24

25

26

Merits Report of Markus Jakobsson, Ph.D., dated Feb. 9, 2024						
49	880-3	23 ¶ 62 n.25, after "(Zuckerberg, Jun. 2016:"	This information contains non-public information regarding Meta's confidential non-public internal strateg considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.			
50	880-3	24 ¶ 63, between "You should figure out how to do this." and "This seems like an important"	This information contains non-public information regarding Meta's confidential non-public internal strategy considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta' competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.			

1	51	880-3	25-26 ¶ 66, between "unfortunately	This text details the strategy and proprietary sources and methods for
2			uninformative." and "That	gathering market research. This
2			said—we are"	information contains nonpublic and
3				confidential research regarding app
				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that research, and proprietary, confidential
6				research into potential methodologies for
0				conducting market research. This
7				information has never been disclosed
8				publicly and Meta's product team treats it as strictly confidential. If publicly
9				revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
1.1				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
				themselves from Meta. This information contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
1				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could
10				influence the competitive decision-
17				making and business strategies employed
				by Meta's competitors, for example by
18				influencing how those competitors
19				conduct market research and how they
				distinguish themselves from Meta.
20				
21				

23

24

25

26

1	52	880-3	27-28 ¶ 71, image after "this	This text details the strategy and
1			at enough detail'"	proprietary sources and methods for
2				gathering market research. This
				information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that
				research, and proprietary, confidential
6				research into potential methodologies for
				conducting market research. This
7				information has never been disclosed
8				publicly and Meta's product team treats it
0				as strictly confidential. If publicly
9				revealed, this information could influence
				the competitive decision-making and
10				business strategies employed by Meta's
				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
				research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product
13				team treats it as strictly confidential. If
16				publicly revealed, this information could
				influence the competitive decision-
17				making and business strategies employed
1.0				by Meta's competitors, for example by
18				influencing how those competitors
19				conduct market research and how they distinguish themselves from Meta.
				distinguish themselves from Meta.
20				
2.1				
21				

23

24

25

26

1	53	880-3	33-34 ¶ 77, image after "of	This text details the strategy and
1			IAAP-derived data"	proprietary sources and methods for
2				gathering market research. This
				information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that
				research, and proprietary, confidential
6				research into potential methodologies for
				conducting market research. This
7				information has never been disclosed
0				publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
				the competitive decision-making and
10				business strategies employed by Meta's
				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
				research regarding competitive analysis.
14				This information has never been
				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could
10				influence the competitive decision-
17				making and business strategies employed
				by Meta's competitors, for example by
18				influencing how those competitors
10				conduct market research and how they
19				distinguish themselves from Meta.
20				

22

23

24

25

26

1	54	880-3	34-35 ¶ 78, after "Patel, and others, explained:"	This text details the strategy and proprietary, confidential research into
2			1	potential methodologies for conducting
3				market research. This information has never been disclosed publicly and Meta's
4				product team treats it as strictly
				confidential. If publicly revealed, this information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing how those competitors conduct market
8				research and how they distinguish
				themselves from Meta. This information contains nonpublic and confidential
9				research regarding competitive analysis.
10				This information has never been
11				disclosed publicly and Meta's product team treats it as strictly confidential. If
12				publicly revealed, this information could
				influence the competitive decision- making and business strategies employed
13				by Meta's competitors, for example by
14				influencing how those competitors
15				conduct market research and how they distinguish themselves from Meta.
		<u> </u>	1	distinguish memberves from wiett.
16				

	55	000.2	25 26 ¶ 70 1 !!	This same data is the start are all
1] 55	880-3	35-36 ¶ 79, between "propose that Facebook" and "The	This text details the strategy and proprietary, confidential research into
2			second option is;" and	potential methodologies for conducting
			between "The second option	market research. This information has
3			is" and "by Naveh, Priell,"	never been disclosed publicly and Meta's
4				product team treats it as strictly confidential. If publicly revealed, this
<u>-</u>				information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing how those competitors conduct market
				research and how they distinguish
8				themselves from Meta. This information
9				contains nonpublic and confidential
10				research regarding competitive analysis. This information has never been
10				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could
				influence the competitive decision- making and business strategies employed
13				by Meta's competitors, for example by
14				influencing how those competitors
15				conduct market research and how they
13				distinguish themselves from Meta.
16				
17				
1.0				
18				
19				

21

22

23

24

25

26

1	56	880-3	36-37 ¶ 80, between "In	This text details the strategy and
1			particular, the first option—"	proprietary, confidential research into
2			and "—is something that no	potential methodologies for conducting
3			legitimate"	market research. This information has
3				never been disclosed publicly and Meta's product team treats it as strictly
4				confidential. If publicly revealed, this
5				information could influence the
				competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish
				themselves from Meta. This information
9				contains nonpublic and confidential
10				research regarding competitive analysis. This information has never been
10				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
				publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
				by Meta's competitors, for example by
14				influencing how those competitors
15				conduct market research and how they
13				distinguish themselves from Meta.
16				
17				
1 /				

1	57	880-3	37 ¶ 81, between "option—the	This text details the strategy and
			one" and "by Erez Naveh;"	proprietary, confidential research into
2			and after "team recommends	potential methodologies for conducting
			that Facebook"	market research. This information has
3				never been disclosed publicly and Meta's
4				product team treats it as strictly
7				confidential. If publicly revealed, this
5				information could influence the
				competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish
				themselves from Meta. This information
9				contains nonpublic and confidential
				research regarding competitive analysis.
10				This information has never been
11				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could
				influence the competitive decision-
13				making and business strategies employed
1.4				by Meta's competitors, for example by
14				influencing how those competitors
15				conduct market research and how they
13				distinguish themselves from Meta.
16				
17				
10				
18				

20

21

22

23

24

25

26

1	58	880-3	37 ¶ 82, between "I refer to"	This text details the strategy and
1			and "that Facebook's Erez	proprietary, confidential research into
2			Naveh;" between "'zero day'	potential methodologies for conducting
3			because a" and "that would allow a developer like	market research. This information has never been disclosed publicly and Meta's
4			Facebook to;" and between "that would allow a developer	product team treats it as strictly confidential. If publicly revealed, this
5			like Facebook to" and "to avoid certificate pinning"	information could influence the competitive decision-making and
6			avoid certificate priming	business strategies employed by Meta's competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
9				contains nonpublic and confidential research regarding competitive analysis.
10				This information has never been
11				disclosed publicly and Meta's product team treats it as strictly confidential. If
11				publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
14				by Meta's competitors, for example by influencing how those competitors
17				conduct market research and how they
15				distinguish themselves from Meta.
16				
17				
18				
19				
20				
21				
22				
23				
24				
25				

1	59	880-3	38 ¶ 84, between "Naveh and	This text details the strategy and
1			Priell" and "that if Snapchat	proprietary, confidential research into
2			implements;" and between "its analytics, Facebook" and	potential methodologies for conducting market research. This information has
3			", all so that Facebook can	never been disclosed publicly and Meta's
			continue"	product team treats it as strictly
4				confidential. If publicly revealed, this
5				information could influence the
				competitive decision-making and business strategies employed by Meta's
6				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish
8				themselves from Meta. This information
9				contains nonpublic and confidential research regarding competitive analysis.
10				This information has never been
				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could influence the competitive decision-
13				making and business strategies employed
13				by Meta's competitors, for example by
14				influencing how those competitors
15				conduct market research and how they distinguish themselves from Meta.
				distinguisii dichiscives Holli Meta.
16				
17				
18				
19				
17				

21

22

23

24

25

26

1	60	880-3	38 ¶ 85, between "their	This text details the strategy and
1			recommended option—" and	proprietary, confidential research into
2			"However, as a 'Con,' they	potential methodologies for conducting
3			recognize that;" and after ""However, as a 'Con,' they	market research. This information has never been disclosed publicly and Meta's
4			recognize that"	product team treats it as strictly confidential. If publicly revealed, this
				information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
9				contains nonpublic and confidential
10				research regarding competitive analysis. This information has never been
11				disclosed publicly and Meta's product team treats it as strictly confidential. If
12				publicly revealed, this information could
13				influence the competitive decision- making and business strategies employed
				by Meta's competitors, for example by
14				influencing how those competitors conduct market research and how they
15				distinguish themselves from Meta.
16				
17				
18				
19				
20				

22

23

24

25

26

1	61	880-3	38-39 ¶ 86, between	This text details the strategy and
1			"involv[ing]' in the" and "in	proprietary, confidential research into
2			their August 29"	potential methodologies for conducting
2				market research. This information has
3				never been disclosed publicly and Meta's
4				product team treats it as strictly confidential. If publicly revealed, this
_				information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's
				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish
8				themselves from Meta. This information
9				contains nonpublic and confidential
10				research regarding competitive analysis. This information has never been
10				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
4.0				publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
				by Meta's competitors, for example by
14				influencing how those competitors
15				conduct market research and how they
13	<u> </u>			distinguish themselves from Meta.
16				
17				
1 /				

-41-

1	62	880-3	39-40 ¶ 87, between "Priell	This text details the strategy and
1			about 30 days prior:" and	proprietary, confidential research into
2			"The fact that Facebook	potential methodologies for conducting
			would"	market research. This information has
3				never been disclosed publicly and Meta's
4				product team treats it as strictly
4				confidential. If publicly revealed, this
5				information could influence the
				competitive decision-making and
6				business strategies employed by Meta's
_				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish
8				themselves from Meta. This information
9				contains nonpublic and confidential
				research regarding competitive analysis.
10				This information has never been
11				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could
				influence the competitive decision-
13				making and business strategies employed by Meta's competitors, for example by
1.4				influencing how those competitors
14				conduct market research and how they
15				distinguish themselves from Meta.
				distinguish themserves from wieta.
16				
1.7				
17				

1	63	880-3	40 ¶ 88, after "discussion that included the following:"	This text details the strategy and proprietary, confidential research into
2			meraded the following.	potential methodologies for conducting
3				market research. This information has never been disclosed publicly and Meta's
4				product team treats it as strictly
				confidential. If publicly revealed, this information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing how those competitors conduct market
0				research and how they distinguish
8				themselves from Meta. This information
9				contains nonpublic and confidential research regarding competitive analysis.
10				This information has never been
11				disclosed publicly and Meta's product team treats it as strictly confidential. If
11				publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
1.4				by Meta's competitors, for example by
14				influencing how those competitors conduct market research and how they
15				distinguish themselves from Meta.
16				
17				
- /	1			

1	64	880-3	41 ¶ 90, between "suspect	This text details the strategy and
2			acts, including" and "in order to continue Facebook's"	proprietary, confidential research into potential methodologies for conducting
			10 001111111111111111111111111111111111	market research. This information has
3				never been disclosed publicly and Meta's
4				product team treats it as strictly confidential. If publicly revealed, this
5				information could influence the
6				competitive decision-making and business strategies employed by Meta's
				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
9				contains nonpublic and confidential
10				research regarding competitive analysis. This information has never been
				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
14				by Meta's competitors, for example by influencing how those competitors
				conduct market research and how they
15				distinguish themselves from Meta.
16				
17				

	65	880-3	48 ¶ 108, between "dollars to	This text details the strategy and
1	0.5	880-3	deploy it, and then" and	proprietary sources and methods for
2			"when this bespoke technical"	gathering market research. This
_			1	information contains nonpublic and
3				confidential research regarding app
,				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that
				research, and proprietary, confidential
6				research into potential methodologies for conducting market research. This
7				information has never been disclosed
				publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
				the competitive decision-making and
10				business strategies employed by Meta's
$_{11}$				competitors, for example by influencing
1				how those competitors conduct market research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could
				influence the competitive decision- making and business strategies employed
17				by Meta's competitors, for example by
18				influencing how those competitors
				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
22				

25

26

	((000.2	50 ff 115 1	This area date its the standard and the
1	66	880-3	52 ¶ 115, between "the Snapchat app, including" and	This text details the strategy and proprietary sources and methods for
2			"—was, according to the"	gathering market research. This
_				information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This information has never been disclosed
8				publicly and Meta's product team treats it as strictly confidential. If publicly
9				revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
1.1				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish themselves from Meta. This information
13				contains nonpublic and confidential
				research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product team treats it as strictly confidential. If
				publicly revealed, this information could
16				influence the competitive decision-
17				making and business strategies employed
18				by Meta's competitors, for example by influencing how those competitors
				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
22				

24

25

26

1	67	880-3	53 ¶ 117, image after "in the	This document is the performance review
1			same document:"	of an employee not named in this lawsuit.
2				Its disclosure would publicize employee
_				performance matters with no relevance to
3				the case and violate the reasonable
4				expectation that Meta would maintain the
4				confidentiality of this information. This
5				document also details the strategy and
				proprietary sources and methods for
6				gathering market research. This
_				information contains nonpublic and
7				confidential research regarding app
8				performance data and competitive
0				analysis, including proprietary methods
9				for obtaining that data or conducting that
				research, and proprietary, confidential
10				research into potential methodologies for
				conducting market research. This
11				information has never been disclosed
12				publicly and Meta's product team treats it
12				as strictly confidential. If publicly
13				revealed, this information could influence
				the competitive decision-making and
14				business strategies employed by Meta's
1.5				competitors, for example by influencing
15				how those competitors conduct market
16				research and how they distinguish
10				themselves from Meta. This information
17				contains nonpublic and confidential
1.0				research regarding competitive analysis.
18				This information has never been
19				disclosed publicly and Meta's product team treats it as strictly confidential. If
17				publicly revealed, this information could
20				influence the competitive decision-
2.1				making and business strategies employed
21				by Meta's competitors, for example by
22				influencing how those competitors
<i></i>				conduct market research and how they
23				distinguish themselves from Meta.
	L		<u> </u>	distinguish member, es irom mem.
24				

25

26

1	68	880-3	59-60 ¶ 139, between	This text details the strategy and
1			"recommended that	proprietary sources and methods for
2			Facebook" and "as a response	gathering market research. This
			to potential certificate"	information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
7				analysis, including proprietary methods
5				for obtaining that data or conducting that
				research, and proprietary, confidential research into potential methodologies for
6				conducting market research. This
7				information has never been disclosed
				publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
				the competitive decision-making and
10				business strategies employed by Meta's
11				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish themselves from Meta. This information
1.2				contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could
				influence the competitive decision-
17				making and business strategies employed by Meta's competitors, for example by
18				influencing how those competitors
10				conduct market research and how they
19				distinguish themselves from Meta.
20	De	fendant Me	ta Platforms, Inc.'s Notice of M	Iotion and Motion to Exclude Expert
20				on, Exhibit 3, Excerpts of Advertiser
21		Plaintiffs'	-	Ieta Platforms, Inc.'s Fifth Set of
22		T	Interrogatories to Adve	I
22	69	880-4	935:23, between "Role" and	This document relates to the performance
23			"acted as a lead"	review of an employee not named in this
2.4				lawsuit. Its disclosure would publicize employee performance matters with no
24				relevance to the case and violate the
25				reasonable expectation that Meta would
				maintain the confidentiality of this
26				information.
27				
28	No. 3:20-	cv-08570-JD	-48-	DECL. OF AMRISH ACHARYA ISO OMNIBUS

22

23

24

25

26

1	71	886-1	8:12-14, between "jury and	This text details the strategy and
2			the Court—" and ", during the Class Period"	proprietary, confidential research into potential methodologies for conducting
				market research. This information has
3				never been disclosed publicly and Meta's product team treats it as strictly
4				confidential. If publicly revealed, this
5				information could influence the
6				competitive decision-making and business strategies employed by Meta's
				competitors, for example by influencing
7				how those competitors conduct market research and how they distinguish
8				themselves from Meta. This information
9				contains nonpublic and confidential
10				research regarding competitive analysis. This information has never been
				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
14				by Meta's competitors, for example by influencing how those competitors
				conduct market research and how they
15				distinguish themselves from Meta.
16				
17				
18				

20

21

22

23

24

25

26

1	72	886-1	8:18-19, between "program	This text details the strategy and
			leads recommended" and "to continue the"	proprietary, confidential research into
2			continue the	potential methodologies for conducting market research. This information has
3				never been disclosed publicly and Meta's
4				product team treats it as strictly
				confidential. If publicly revealed, this information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing how those competitors conduct market
,				research and how they distinguish
8				themselves from Meta. This information
9				contains nonpublic and confidential
10				research regarding competitive analysis. This information has never been
				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could influence the competitive decision-
13				making and business strategies employed
				by Meta's competitors, for example by
14				influencing how those competitors conduct market research and how they
15				distinguish themselves from Meta.
16		•		
17				

73 886-1	8:21, between "capabilities of Pegasus," and "Id. ¶¶ 86-91"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed
		by Meta's competitors, for example by influencing how those competitors conduct market research and how they
		distinguish themselves from Meta.
Advertiser Plai		Meta Platforms, Inc.'s Motion to Exclude
-1 0001	Testimony of Dr. Til	T
74 888-1	13:18-22, between "end-to-end encryption. ¶173." and "Id. As part of this"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

1 2 3 4 5 6 7	75	888-1	14:2, between "succeeded in making" and "¶173. The finder-of-fact"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
8	A	dvertiser Pl		nt Meta Platforms, Inc.'s Motion for
9		I	Summary Jud	
10 11 12 13 14 15 16 17 18 19 20	76	892-1	1:12, between "restricts Apple's" and "Ex. 10. And they will"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.
2122232425				
۷٥				

27

77	002.1	2.10 1.4	This tast a stains so well it as a
77	892-1	2:10, between "expressly restricted Apple's" and "Ex. 10. The jury will"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta' competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.
78	892-1	9:15-16, between "(limiting Apple's" and "Others, too, acknowledged"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partne as well as internal strategy relating to those agreements. Disclosure of this non public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta' competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.

-54-

 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

1	79	892-1	13:25-26 n.5, between	This text details the strategy and
1			"competitively important" and	proprietary, confidential research into
2			"Exs. 35, 36 at 8435-36,	potential methodologies for conducting
3			followed by"	market research. This information has
3				never been disclosed publicly and Meta's product team treats it as strictly
4				confidential. If publicly revealed, this
_				information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's
_				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
				contains nonpublic and confidential
9				research regarding competitive analysis.
10				This information has never been
				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could
				influence the competitive decision- making and business strategies employed
13				by Meta's competitors, for example by
14				influencing how those competitors
				conduct market research and how they
15				distinguish themselves from Meta.
16	80	892-1	17:10-13, between "Apple	This text contains non-public and
			was restricted from" and "Ex.	confidential information regarding
17			10 at 9817; see Ex. 40"	Meta's agreements with a non-party
18				developer, advertiser, or business partner as well as internal strategy relating to
10				those agreements. Disclosure of this non-
19				public information is likely to result in
20				competitive harm to Meta, as it reveals
				strategic decision-making which, for
21				example, could give a developer,
22				advertiser, or business partner unfair leverage in competing against or
				negotiating with Meta. Moreover, Meta's
23				competitors could use this non-party
24				information to unfairly target Meta's
				developers, advertisers, or business
25				partners and offer specific deal terms
26				designed to undercut those offered by Meta.
20				IVICia.
2.7	1			

No. 3:20-cv-08570-JD

1	81	892-1	20:16-17, between "delivered Oct. 2018, showing" and	This information contains confidential, non-public information regarding Meta's
2			"budget reduction across;"	internal business strategies and analyses,
3			between "content, with a" and "and an additional;" and	including summaries and discussions of Meta's internal modeling and
4			between "and an additional"	assessments of its products that reveal
5			and "In 2018, Netflix increased"	competitively sensitive information, including how Meta's products and
				services operate, and potential improvements or other product changes.
6				Disclosure of this non-public information
7				is likely to result in competitive harm to Meta, as it reveals strategic decision-
8				making which, for example, could give a
9				developer, advertiser, or business partner unfair leverage in competing against or
10				negotiating with Meta.
11	82	892-1	20:18-19, between "Meta ad	This text contains non-public and
12			spend to a record" and ", Ex. 94 at 0031;"	confidential information regarding the advertising spend of a particular
13			, , , , , , , , , , , , , , , , , , , ,	advertiser. Disclosure of this non-public
14				information is likely to result in competitive harm to Meta, as it reveals
15				strategic decision-making which, for example, could give an advertiser unfair
16				leverage in competing against or
17				negotiating with Meta. Moreover, Meta's competitors could use this non-party
				information to unfairly target Meta's
18				advertisers and offer specific deal terms designed to undercut those offered by
19				Meta. That advertiser likely also has a
20				reasonable expectation Meta will maintain the confidentiality of this
21				information.
22				

24

25

26

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 1, Expert Merits Report of Michael A. Williams, dated							
2	Aug. 5, 2024							
3	83	892-3	13-14 ¶ 29 n.26, between "an internal email that Facebook"	This information contains non-public information regarding Meta's				
4			and "(PX 594). On December	confidential non-public internal strategic				
5			3, 2019;" and between "Stephanie Wang wrote that"	considerations related to creating value for and attracting users or advertisers to				
			and "(PALM-016888726-727,	Meta's products or services. This information has never been disclosed				
6			at 727)"	publicly. Disclosure of this information				
7				would adversely impact Meta's current competitive position by enabling Meta's				
8				competitors to mimic its confidential				
9				strategies in an effort to attract users or advertisers away from Meta.				
10	84	892-3	16 ¶ 34, after "The logs are	This information contains confidential,				
11			then processed for:"	proprietary, and commercially sensitive information regarding the technical				
12				functionalities and processes of Meta's				
13				ad auction, ad targeting and delivery systems, or data tables. This information				
14				has never been disclosed publicly and Meta's product team treats it as strictly				
15				confidential. If publicly revealed, this				
				information could influence the competitive decision-making and				
16				business strategies employed by Meta's				
17	0.7	0000	10.10.7.10.1	competitors in advertising.				
18	85	892-3	18-19 ¶ 40, between "Facebook's advertising	This information contains non-public information regarding Meta's				
19			strategy of" and "Mr. Jakubowski confirmed"	confidential non-public internal strategic				
20			Jakubowski confirmed	considerations related to creating value for and attracting users or advertisers to				
21				Meta's products or services. This information has never been disclosed				
				publicly. Disclosure of this information				
22				would adversely impact Meta's current competitive position by enabling Meta's				
23				competitors to mimic its confidential				
24				strategies in an effort to attract users or advertisers away from Meta.				
25		l		ad-closes away from mea.				

26

1	86	892-3	23-24 ¶ 53, after "a 2020 Facebook document states:"	This information contains confidential, proprietary, and commercially sensitive
2				information regarding the technical functionalities and processes of Meta's
3				ad auction, ad targeting and delivery
4				systems, or data tables. This information has never been disclosed publicly and
5				Meta's product team treats it as strictly
6				confidential. If publicly revealed, this information could influence the
				competitive decision-making and
7				business strategies employed by Meta's competitors in advertising.
8	87	892-3	38 ¶ 94, between "2013	This information reflects and is
9			presentation notes that the" and "was generated from	calculated from internal, non-public Meta financial data. Were this information to
10			local;" between	be publicly revealed, it could cause Meta
11			"unsophisticated brands" and "developers and sophisticated	competitive harm by giving competitors insight into confidential Meta financial
12			brands;" between "developers	information.
13			and sophisticated brands" and "marketers requiring	
14			advanced features;" between "marketers requiring	
			advanced features" and "local	
15			business;" and after "local business"	
16	88	892-3	26 ¶ 59, between "FAN	This information reflects and is
17			accounts for" and "of Facebook's advertising	calculated from internal, non-public Meta financial data. Were this information to
18			revenues"	be publicly revealed, it could cause Meta
19				competitive harm by giving competitors insight into confidential Meta financial
20				information.
21	89	892-3	69 ¶ 186, between "the meeting brief states:" and	This text contains confidential, non-public information regarding a non-party
22			"Similarly, in another email	developer, advertiser, or business partner
			exchange"	and implicates the nonparty's confidentiality interests, by revealing the
23				identity of a Meta developer, advertiser,
24				or business partner who is not a party to this litigation, and who has a reasonable
25				expectation that Meta will maintain the
26				confidentiality of contractual terms and its own confidential statements made
27				during negotiations.
27				during negotiations.

1 2 3 4 5 6 7	90	892-3	69-70 ¶ 187, after "these business segments as:"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
8	91	892-3	69-70 ¶ 187 n.263, between	This information contains non-public
9			"customers into type," and	information regarding Meta's
1.0			"(PALM-008265252, pp. 86-	confidential non-public internal strategic
10			89)"	considerations related to creating value for and attracting users or advertisers to
11				Meta's products or services. This
12				information has never been disclosed
				publicly. Disclosure of this information
13 14				would adversely impact Meta's current competitive position by enabling Meta's
15				competitors to mimic its confidential strategies in an effort to attract users or
	92	892-3	71-72 ¶ 192, between	advertisers away from Meta. This information contains confidential,
16		672-3	"relevant ads by" and "This	proprietary, and commercially sensitive
17			means that advertisers can"	information regarding the technical functionalities and processes of Meta's
18				ad auction, ad targeting and delivery
19				systems, or data tables. This information has never been disclosed publicly and
20				Meta's product team treats it as strictly confidential. If publicly revealed, this
21				information could influence the
22				competitive decision-making and business strategies employed by Meta's
23				competitors in advertising.
23		•		<u> </u>

24

25

26

1	93	892-3	72 ¶ 193, after "and under it,"	This information contains confidential, proprietary, and commercially sensitive
2				information regarding the technical
				functionalities and processes of Meta's
3				ad auction, ad targeting and delivery
4				systems, or data tables. This information has never been disclosed publicly and
_				Meta's product team treats it as strictly
5				confidential. If publicly revealed, this
6				information could influence the
7				competitive decision-making and business strategies employed by Meta's
				competitors in advertising.
8	94	892-3	72-73 ¶ 195, after "of bids is	This information contains confidential,
9			calculated by"	proprietary, and commercially sensitive
10				information regarding the technical functionalities and processes of Meta's
10				ad auction, ad targeting and delivery
11				systems, or data tables. This information
12				has never been disclosed publicly and
				Meta's product team treats it as strictly
13				confidential. If publicly revealed, this information could influence the
14				competitive decision-making and
15				business strategies employed by Meta's
13	0.5	002.2	72 F 10 C 1	competitors in advertising.
16	95	892-3	73 ¶ 196, entire paragraph	This information contains confidential, proprietary, and commercially sensitive
17				information regarding the technical
18				functionalities and processes of Meta's ad auction, ad targeting and delivery
19				systems, or data tables. This information has never been disclosed publicly and
20				Meta's product team treats it as strictly
				confidential. If publicly revealed, this
21				information could influence the competitive decision-making and
22				business strategies employed by Meta's
23				competitors in advertising.
24				
∠ - T				

25

26

1	96	892-3	73 ¶ 197, entire paragraph	This information contains confidential, proprietary, and commercially sensitive
2				information regarding the technical
				functionalities and processes of Meta's
3				ad auction, ad targeting and delivery systems, or data tables. This information
4				has never been disclosed publicly and
5				Meta's product team treats it as strictly
				confidential. If publicly revealed, this
6				information could influence the
7				competitive decision-making and business strategies employed by Meta's
				competitors in advertising.
8	97	892-3	73 ¶ 198, image between	This information contains confidential,
9			"EQUATION TO	proprietary, and commercially sensitive
10			ASCERTAIN ROI" and "Source: PALM-010596417"	information regarding the technical functionalities and processes of Meta's
			Source. 174EW-010370417	ad auction, ad targeting and delivery
11				systems, or data tables. This information
12				has never been disclosed publicly and
12				Meta's product team treats it as strictly confidential. If publicly revealed, this
13				information could influence the
14				competitive decision-making and
15				business strategies employed by Meta's
	98	892-3	73 ¶ 198 n.274, between "it	competitors in advertising. This information contains confidential,
16	98	892-3	states that" and "(See PALM-	proprietary, and commercially sensitive
17			007648629,"	information regarding the technical
18				functionalities and processes of Meta's
10				ad auction, ad targeting and delivery
19				systems, or data tables. This information has never been disclosed publicly and
20				Meta's product team treats it as strictly
				confidential. If publicly revealed, this
21				information could influence the competitive decision-making and
22				business strategies employed by Meta's
23				competitors in advertising.
۷٥				

-61-

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

24

25

26

1 2	99	892-3	75 ¶ 202, between "based on targeting" and "This strategy is depicted"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical
			•	functionalities and processes of Meta's
3				ad auction, ad targeting and delivery systems, or data tables. This information
4				has never been disclosed publicly and Meta's product team treats it as strictly
5				confidential. If publicly revealed, this information could influence the
7				competitive decision-making and business strategies employed by Meta's
8	100	892-3	75-77 ¶ 202, image between	competitors in advertising. This information contains confidential,
9	100	072-3	"REVENUE PER	proprietary, and commercially sensitive
			IMPRESSION" and "Source:	information regarding the technical
10			PALM-005396091;" image between "FACEBOOK	functionalities and processes of Meta's ad auction, ad targeting and delivery
11			PRICING STRATEGY" and "Source: PALM-005396091;"	systems, or data tables. This information has never been disclosed publicly and
12			and image between "DETERMINE TRUE	Meta's product team treats it as strictly confidential. If publicly revealed, this
13			VALUE" and "Source:	information could influence the
14			PALM-005396091"	competitive decision-making and
15				business strategies employed by Meta's competitors in advertising.
16	101	892-3	80-81 ¶ 207, image between "OVER TIME IN THE U.S."	This information reflects and is calculated from internal, non-public Meta
17			and "Source: PALM-	financial data. Were this information to
18			014824975"	be publicly revealed, it could cause Meta competitive harm by giving competitors
19				insight into confidential Meta financial information.
20	102	892-3	82-83 ¶ 210, after "It was found that"	This information reflects and is
21			Tound that	calculated from internal, non-public Meta financial data. Were this information to
22				be publicly revealed, it could cause Meta competitive harm by giving competitors
23				insight into confidential Meta financial information.
24	103	892-3	82-83 ¶ 210 n.299, before	This information reflects and is
25			"See PALM-006846145-154, at 147"	calculated from internal, non-public Meta financial data. Were this information to
26				be publicly revealed, it could cause Meta
27				competitive harm by giving competitors insight into confidential Meta financial
28		0.0.===		information.
40	LNo. 3:20-	cv-08570-JD	-62-	DECL. OF AMRISH ACHARYA ISO OMNIBUS

 $\overline{\text{No. }3:20\text{-cv}-08570\text{-JD}}$

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND DAUBERT BRIEFING

1	104	892-3	83 ¶ 211, between "prices, which was" and "Demand	This information reflects and is calculated from internal, non-public Meta
2			rose because advertisers	financial data. Were this information to
3			were," and after "Demand rose because advertisers	be publicly revealed, it could cause Meta competitive harm by giving competitors
4			were"	insight into confidential Meta financial information.
5	105	892-3	83 ¶ 212, between "growth, stating that" and "The result	This information contains confidential, proprietary, and commercially sensitive
6			was contrary;" between "increased prices, the	information regarding the technical
7			business" and "Thus, the	functionalities and processes of Meta's ad auction, ad targeting and delivery
8			document concluded;" between "[t]his suggests that"	systems, or data tables. This information has never been disclosed publicly and
9			and "Such drivers led to;" and after "a later 2018 document,	Meta's product team treats it as strictly confidential. If publicly revealed, this
10			since"	information could influence the
11				competitive decision-making and business strategies employed by Meta's
12	106	892-3	85-86 ¶ 217, between "own	competitors in advertising. This information reflects and is
13	100	0,2 3	data, more than" and of	calculated from internal, non-public Meta
14			advertisers on Facebook;" between "purchases in no more than" and "of the	financial data. Were this information to be publicly revealed, it could cause Meta
15			available 138 months;"	competitive harm by giving competitors insight into confidential Meta financial
16			between "Figure 19, more than" and "of advertisers on	information.
17			Facebook;" and between "total ad spend of less than"	
18			and "in the entire data period"	
19	107	892-3	85-86 ¶ 217, image between "THROUGH JUNE 2022"	This information reflects and is calculated from internal, non-public Meta
20			and "Source: Meta, 'RFP 78	financial data. Were this information to
21			Data,' PALM-017052724"	be publicly revealed, it could cause Meta competitive harm by giving competitors
22				insight into confidential Meta financial information.
23	108	892-3	87 ¶ 217, image between	This information reflects and is
24			"THROUGH JUNE 2022" and "g. Specialized vendors"	calculated from internal, non-public Meta financial data. Were this information to
25				be publicly revealed, it could cause Meta competitive harm by giving competitors
26				insight into confidential Meta financial information.
27		I	1	

1	109	892-3	92-93 ¶ 235, image between "OVER TIME IN THE U.S." and "Source: PALM-	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to
2			014824975"	be publicly revealed, it could cause Meta
3				competitive harm by giving competitors
4				insight into confidential Meta financial
4	110			information.
5	110	892-3	131 ¶ 312, between "social	This information reflects and is calculated from internal, non-public Meta
6			advertising were between" and "To calculate Facebook's	financial data. Were this information to
			revenue," and between "is	be publicly revealed, it could cause Meta
7			expected to be at least" and	competitive harm by giving competitors
8			"in the period 2017-2020"	insight into confidential Meta financial information.
9	111	892-3	131 ¶ 314, after "cap and	This information reflects and is
10			explained that Facebook's"	calculated from internal, non-public Meta financial data. Were this information to
				be publicly revealed, it could cause Meta
11				competitive harm by giving competitors
12				insight into confidential Meta financial
13	112	892-3	152 ¶ 262 n 507 h street	information. This information reveals Meta's internal
13	112	892-3	152 ¶ 363 n.587, between "produced by Facebook, out	non-public pricing information for
14			of" and "advertisers that	advertising on Meta's products or
15			purchased ads;" between "in	services, including how those prices can
			the Class Period, just" and "of	be determined. This information is not
16			those advertisers;" between "Facebook's stated goal was	otherwise publicly reported by the company and disclosure is likely to cause
17			for the" and "As stated in a	Meta competitive harm and give its
1.0			Facebook document;" and	competitors an unfair advantage. Meta's
18			between "frequency ('RF')] is"	competitors could improperly utilize this
19			and "PALM-015191749-754"	internal, non-public information to modify or augment their business
20				operations in an effort to compete
				unfairly against Meta.
21	113	892-3	203 at TABLE A1, Row 11 of	This information reflects and is
22			Column 1 (PALM-	calculated from internal, non-public Meta
22			006480355), after "social advertising were between"	financial data. Were this information to be publicly revealed, it could cause Meta
23			date of thome were between	competitive harm by giving competitors
24				insight into confidential Meta financial
25				information.

No. 3:20-cv-08570-JD

26

27

2 3 4	114	892-3	204 at TABLE A1, Row 17 of Column 1 (PALM- 014096958-994), after "from February 2019 notes that"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
5	Ac	lvertiser Pl	aintiffs' Opposition to Defenda	nt Meta Platforms, Inc.'s Motion for
				of Michael A. Williams, Ph.D., May 24,
,		v o	2024	, , ,
	115	892-3	8 ¶ 17, between "which accounted for" and "of Facebook's ad revenue"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
1 2 3 4	116	892-3	8 ¶ 17, between "ranging from" and "Projections suggested it;" and between "would remain above" and "from 2017-2020"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
5 6 7 8 9 0 1 1 2	117	892-3	31 ¶ 66 n.64, between "Facebook, out of" and "advertisers that purchased;" between "the Class Period, just" and "of those advertisers;" between "Facebook's stated goal was for the" and "As stated in a Facebook document;" and between "margin on [reach and frequency ('RF')] is" and "PALM-015191749-754"	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or services, including how those prices can be determined. This information is not otherwise publicly reported by the company and disclosure is likely to cause Meta competitive harm and give its competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public information to modify or augment their business operations in an effort to compete unfairly against Meta.
3				unfairly against Meta.

-65-

24

25

26

1 2	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 3, Expert Reply Report of Michael A. Williams, Ph.D., dated July 8, 2024			
3	118	892-3	8-9 ¶ 28 n.24, between "Meta was associated with" and "of	This information reflects and is calculated from internal, non-public Meta
4			the ad spend;" between "targeting is associated with	financial data. Were this information to be publicly revealed, it could cause Meta
5			over" and "of ad spend;"	competitive harm by giving competitors
6			between "geographic targeting is associated with over" and "of ad spend;" and	insight into confidential Meta financial information.
7			between "There is" and "ad spend associated only"	
8	119	892-3	9 ¶ 30, between "age targeting	This information reflects and is
9			was associated with over" and "of ad spend;" and between	calculated from internal, non-public Meta financial data. Were this information to
10			"geographic targeting was	be publicly revealed, it could cause Meta
11			associated with over" and "of ad spend"	competitive harm by giving competitors insight into confidential Meta financial information.
12	120	892-3	17-18 ¶ 48, image between	This information reflects and is
13			"FACEBOOK'S COST AND CAPITAL" and "Source:	calculated from internal, non-public Meta financial data. Were this information to
14			PALM-014824975"	be publicly revealed, it could cause Meta
15 16				competitive harm by giving competitors insight into confidential Meta financial information.
17	121	892-3	19 ¶ 50, between "in order to	This information reflects and is
18			meet our financial goals," and "Plaintiffs have not alleged;"	calculated from internal, non-public Meta financial data. Were this information to
19			and between "evidence indicating) that Meta's" and	be publicly revealed, it could cause Meta competitive harm by giving competitors
20			"across-the-board cut"	insight into confidential Meta financial information.
21	122	892-3	19 ¶ 51, between "e-mailed	This information reflects and is
22			Fidji Simo, cutting nearly" and "from Watch's budget	calculated from internal, non-public Meta financial data. Were this information to
			for;" and between	be publicly revealed, it could cause Meta
23			"programming, while adding" and "towards creators and	competitive harm by giving competitors insight into confidential Meta financial
24			gaming"	information.

No. 3:20-cv-08570-JD

25

26

27

1	123	892-3	23 ¶ 51 n.53, between "we suggested considering	This information reflects and is calculated from internal, non-public Meta
2			cutting" and "from originals +	financial data. Were this information to
			sports;" and between "next	be publicly revealed, it could cause Meta
3			year and adding" and	competitive harm by giving competitors
4			"towards creators and gaming"	insight into confidential Meta financial information.
5	124	892-3	34 ¶ 90 n.99, between "FAN	This information reflects and is
6			ads accounted for" and "of Facebook's ad revenue"	calculated from internal, non-public Meta financial data. Were this information to
				be publicly revealed, it could cause Meta
7				competitive harm by giving competitors
8				insight into confidential Meta financial information.
9	125	892-3	44-45 ¶ 114, image between	This information reflects and is
10			"CTR INDEX FOR META ADS" and "Source: PALM-	calculated from internal, non-public Meta financial data. Were this information to
11			014347024"	be publicly revealed, it could cause Meta
11				competitive harm by giving competitors
12				insight into confidential Meta financial information.
13	126	892-3	55 ¶ 142, between "Class	This information reflects and is
	120	0,20	Period is nearly" and ". In	calculated from internal, non-public Meta
14			addition;" between ". In	financial data. Were this information to
15			addition" and "of advertisers	be publicly revealed, it could cause Meta
16			purchased at least;" between "of advertisers purchased at	competitive harm by giving competitors insight into confidential Meta financial
			least" and "Facebook	information.
17			impressions in;" between "chance that an advertiser that	
18			purchased" and "Facebook	
19			impressions purchased;" between "by the alleged	
20			conduct is over" and ". That	
			is, at least;" between ". That	
21			is, at least" and "of advertisers	
22			have a more than;" and between "of advertisers have	
23			a more than" and "chance of	
			being injured"	
24				

25

26

1 2 3 4 5	127	892-3	60 ¶ 154, between "points out that Meta budgeted" and "in 2018 for ad coupons;" between "investigation reveals that only" and "was earmarked;" between "Parties' while" and "was allocated to;" and between "members were less than" and "of Meta's advertising revenue"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
6 7 8 9 10	128	892-3	advertising revenue" 60 ¶ 155, between "buying reached as high as" and "during the class period;" between "by Facebook, out of" and "advertisers that purchased ads;" and between "in the Class Period, just" and "of those advertisers only"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
11 12 13 14 15	129	892-3	60 ¶ 155 n.191, between "just stick with staying at" and "of total ad revenue"	This information reflects and is calculated from internal, non-public Meta financial data. Were this information to be publicly revealed, it could cause Meta competitive harm by giving competitors insight into confidential Meta financial information.
16 17	130	892-3	61 ¶ 157, between "Facebook's stated goal is" and "Indeed some advertisers	This information reveals Meta's internal non-public pricing information for advertising on Meta's products or
18			use"	services, including how those prices can be determined. This information is not otherwise publicly reported by the
19				company and disclosure is likely to cause Meta competitive harm and give its
20 21				competitors an unfair advantage. Meta's competitors could improperly utilize this
22				internal, non-public information to modify or augment their business operations in an effort to compete
23				unfairly against Meta.

24

25

26

1	131	892-3	61 ¶ 157 n.195, between "[reach and frequency ('RF')]	This information reveals Meta's internal non-public pricing information for
2			is" and "PALM-015191749-	advertising on Meta's products or
3			754"	services, including how those prices can be determined. This information is not
				otherwise publicly reported by the
4				company and disclosure is likely to cause
5				Meta competitive harm and give its competitors an unfair advantage. Meta's
6				competitors could improperly utilize this
7				internal, non-public information to modify or augment their business
				operations in an effort to compete
8				unfairly against Meta.
9	132	892-3	72-75 at Appendix II, all images between	This information reflects and is calculated from internal, non-public Meta
10			"SUPPLEMENTAL TABLES	financial data. Were this information to
11			AND FIGURES" and	be publicly revealed, it could cause Meta
			"Source: Tucker Report"	competitive harm by giving competitors insight into confidential Meta financial
12				information.
13				nt Meta Platforms, Inc.'s Motion for
14	Sumr	nary Judgm		Report of Tilman Klumpp, Ph.D., dated
	133	892-5	Jan. 12, 20 17-18 ¶ 42, between "In a	This text contains non-public and
15		0,20	January 2018" and "In late	confidential information regarding
16			2018"	Meta's agreements with a non-party
10				
				developer, advertiser, or business partner as well as internal strategy relating to
17				developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-
				as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in
17				as well as internal strategy relating to those agreements. Disclosure of this non- public information is likely to result in competitive harm to Meta, as it reveals
17 18				as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer,
17 18 19 20				as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair
17 18 19 20 21				as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or
17 18 19 20				as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party
17 18 19 20 21				as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's
17 18 19 20 21 22				as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party
17 18 19 20 21 22 23				as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business

1	134	892-5	17-18 ¶ 42, after "In a 2018 self-review,"	This document is the performance review of an employee not named in this lawsuit.
2			Self leview,	Its disclosure would publicize employee
				performance matters with no relevance to
3				the case and violate the reasonable expectation that Meta would maintain the
4				confidentiality of this information. This
5				text details the strategy and proprietary sources and methods for gathering
6				market research. This information
7				contains nonpublic and confidential research regarding app performance data
8				and competitive analysis, including
9				proprietary methods for obtaining that data or conducting that research, and
				proprietary, confidential research into
10				potential methodologies for conducting market research. This information has
11				never been disclosed publicly and Meta's
12				product team treats it as strictly confidential. If publicly revealed, this
13				information could influence the
				competitive decision-making and
14				business strategies employed by Meta's competitors, for example by influencing
15				how those competitors conduct market
16				research and how they distinguish themselves from Meta. This information
17				contains nonpublic and confidential
				research regarding competitive analysis. This information has never been
18				disclosed publicly and Meta's product
19				team treats it as strictly confidential. If
20				publicly revealed, this information could influence the competitive decision-
21				making and business strategies employed
22				by Meta's competitors, for example by influencing how those competitors
				conduct market research and how they
23	10.7	000 7	41 42 5 05 1	distinguish themselves from Meta.
24	135	892-5	41-42 ¶ 87, between "EBDA. And:" and "On June 18 2018"	This information reflects and is calculated from internal, non-public Meta
25				financial data. Were this information to
26				be publicly revealed, it could cause Meta competitive harm by giving competitors
27				insight into confidential Meta financial
28				information.

28 | No. 3:20-cv-08570-JD

1	136	892-5	48-49 ¶ 103 n.178, between "Dec. 6, 2016 presentation	This information reflects and is calculated from internal, non-public Meta
2			identifying" and "PALM- 005452186-195;" between	financial data. Were this information to be publicly revealed, it could cause Meta
3			"Nov. 27, 2017 emails:" and	competitive harm by giving competitors
4			"PALM-005487488-495;"	insight into confidential Meta financial
			and after "May 25, 2018 Zuckerberg email:"	information.
5	137	892-5	49-50 ¶ 105 n.183, between	This information reflects and is
6			"Dec. 6, 2016 presentation	calculated from internal, non-public Meta
7			identifying" and "PALM-	financial data. Were this information to
			005452186-195;" and after "Nov. 27, 2017 emails:"	be publicly revealed, it could cause Meta competitive harm by giving competitors
8				insight into confidential Meta financial
9	120	892-5	50 (0 ¶ 110 1 t	information.
10	138	892-3	59-60 ¶ 119, between "Facebook planned to spend	This information contains non-public information regarding Meta's
11			nearly" and "in the first part-	confidential non-public internal strategic
			year;" and after "competitive	considerations related to creating value
12			analysis concluded that"	for and attracting users or advertisers to Meta's products or services. This
13				information has never been disclosed
14				publicly. Disclosure of this information would adversely impact Meta's current
15				competitive position by enabling Meta's competitors to mimic its confidential
16				strategies in an effort to attract users or
				advertisers away from Meta.
17	139	892-5	60-61 ¶ 120 n.239, after "PALM-003130978"	This information reflects and is calculated from internal, non-public Meta
18			1 ALWI-003130976	financial data. Were this information to
19				be publicly revealed, it could cause Meta competitive harm by giving competitors
20				insight into confidential Meta financial information.
21	140	892-5	61-62 ¶ 122, between "Mr.	This information reflects and is
22			Hastings explained that" and	calculated from internal, non-public Meta
			"The same notes advised"	financial data. Were this information to be publicly revealed, it could cause Meta
23				competitive harm by giving competitors
24				insight into confidential Meta financial
25				information.

No. 3:20-cv-08570-JD

26

27

1 2 3 4 5 6 7	141	892-5	73 ¶ 142, after "Microsoft informed Facebook that"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
8	142	892-5	73-74 ¶ 143, after "Mr. Vernal	advertisers away from Meta. This information contains non-public
9	142	092-3	agreed, e-mailing:"	information regarding Meta's
				confidential non-public internal strategic
10				considerations related to creating value for and attracting users or advertisers to
11				Meta's products or services. This
12				information has never been disclosed
				publicly. Disclosure of this information would adversely impact Meta's current
13				competitive position by enabling Meta's
14				competitors to mimic its confidential strategies in an effort to attract users or
15				advertisers away from Meta.
16	143	892-5	74 ¶ 144, after "Mr. Daniels confirmed that"	This information contains non-public information regarding Meta's
17				confidential non-public internal strategic
18				considerations related to creating value for and attracting users or advertisers to
19				Meta's products or services. This
20				information has never been disclosed publicly. Disclosure of this information
				would adversely impact Meta's current
21				competitive position by enabling Meta's competitors to mimic its confidential
22				strategies in an effort to attract users or
23		<u> </u>		advertisers away from Meta.
	1			

24

25

26

1	144	892-5	74 ¶ 145, between "Facebook	This information contains non-public
2			that Microsoft wanted" and ", and that a user's Facebook;"	information regarding Meta's confidential non-public internal strategic
			between "at Facebook that it	considerations related to creating value
3			was" and "Ms. White replied later;" and after "the same e-	for and attracting users or advertisers to Meta's products or services. This
4			mail chain that"	information has never been disclosed
5				publicly. Disclosure of this information would adversely impact Meta's current
6				competitive position by enabling Meta's
7				competitors to mimic its confidential strategies in an effort to attract users or
				advertisers away from Meta.
8	145	892-5	76-77 ¶ 151, between "Facebook executives" and	This information contains non-public
9			"For example, on July 9;"	information regarding Meta's confidential non-public internal strategic
10			between "others at Facebook,	considerations related to creating value
11			writing:" and "In the same e-mail, Ms. Chang advised	for and attracting users or advertisers to Meta's products or services. This
12			that;" between "In the same e-	information has never been disclosed
13			mail, Ms. Chang advised that" and "Ms. Chang testified	publicly. Disclosure of this information would adversely impact Meta's current
			that;" and after "Zuckerberg	competitive position by enabling Meta's
14			on April 30, 2014"	competitors to mimic its confidential strategies in an effort to attract users or
15				advertisers away from Meta.
16				
17				
18				
19				

-73-

20

21

22

23

24

25

26

146	892-5	79-80 ¶ 157, after "— expressly addresses"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.
147	892-5	80 ¶ 158, after "Microsoft agreed as follows:"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.

No. 3:20-cv-08570-JD

		I	1
148	892-5	80 ¶ 158 n.353, before "PALM-008914036-056"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.
149	892-5	81 ¶ 159, between "Microsoft agreed to" and "With this agreement in place"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.

1	150	892-5	82 ¶ 164 n.357, between "a January 28, 2015" and "(See	This text contains non-public and confidential information regarding
2			PALM-007633377-379.)"	Meta's agreements with a non-party
				developer, advertiser, or business partner
3				as well as internal strategy relating to those agreements. Disclosure of this non-
4				public information is likely to result in
5				competitive harm to Meta, as it reveals strategic decision-making which, for
6				example, could give a developer,
7				advertiser, or business partner unfair
				leverage in competing against or negotiating with Meta. Moreover, Meta's
8				competitors could use this non-party
9				information to unfairly target Meta's developers, advertisers, or business
10				partners and offer specific deal terms
11				designed to undercut those offered by Meta.
	151	892-5	82-83 ¶ 165 n.358, between	This text contains confidential, non-
12		0,2 3	"following termination	public information regarding a non-party
13			provision:" and "(See PALM-	developer, advertiser, or business partner
14			002014487-535"	and implicates the nonparty's confidentiality interests, by revealing the
				identity of a Meta developer, advertiser,
15				or business partner who is not a party to
16				this litigation, and who has a reasonable expectation that Meta will maintain the
17				confidentiality of contractual terms and
18				its own confidential statements made during negotiations. Further, disclosure
				of this non-public information is likely to
19				result in competitive harm to Meta, as it
20				reveals strategic decision-making, which, for example, could give a competitor or
21				potential business partner unfair leverage
				in competing against or negotiating with
22				Meta. Moreover, Meta's competitors could use this non-party information to
23				unfairly target Meta's developer,
24				
24				advertiser, or business partner.

27

1	152	892-5	84 ¶ 167 n.360, between "at 266" and "PALM-ADI-	This text contains confidential, non-public information regarding a non-party
2			0001000836-837"	developer, advertiser, or business partner
3				and implicates the nonparty's confidentiality interests, by revealing the
				identity of a Meta developer, advertiser,
4				or business partner who is not a party to this litigation, and who has a reasonable
5				expectation that Meta will maintain the
6				confidentiality of contractual terms and
7				its own confidential statements made during negotiations. Further, disclosure
8				of this non-public information is likely to result in competitive harm to Meta, as it
9				reveals strategic decision-making, which, for example, could give a competitor or
10				potential business partner unfair leverage
11				in competing against or negotiating with Meta. Moreover, Meta's competitors
12				could use this non-party information to
				unfairly target Meta's developer, advertiser, or business partner.
13	153	892-5	84-85 ¶ 169 n. 361, between	This information contains non-public
14			"internal Facebook email	information regarding Meta's
15			describing" and "Bell, K. (January 25;" and after	confidential non-public internal strategic considerations related to creating value
16			"PALM-FTC-00968368"	for and attracting users or advertisers to
17				Meta's products or services. This information has never been disclosed
				publicly. Disclosure of this information
18				would adversely impact Meta's current competitive position by enabling Meta's
19				competitors to mimic its confidential
20				strategies in an effort to attract users or advertisers away from Meta.
21		l		advertisers away from Meta.

-77-

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

22

23

24

25

26

1	154	892-5	85-86 ¶ 170, between "Directors presentation noted	This information contains non-public information regarding Meta's
2			that" and image of "2019	confidential non-public internal strategic
3			Product Strategy"	considerations related to creating value for and attracting users or advertisers to
3				Meta's products or services. This
4				information has never been disclosed
5				publicly. Disclosure of this information
6				would adversely impact Meta's current competitive position by enabling Meta's
0				competitors to mimic its confidential
7				strategies in an effort to attract users or
8	155	892-5	05 06 ¶ 170 image suin	advertisers away from Meta.
9	133	892-3	85-86 ¶ 170, image snip between "and social	This information contains non-public information regarding Meta's
9			infrastructure." and "Source:	confidential non-public internal strategic
10			PALM-FTC-00968366-404"	considerations related to creating value
11				for and attracting users or advertisers to Meta's products or services. This
				information has never been disclosed
12				publicly. Disclosure of this information
13				would adversely impact Meta's current
14				competitive position by enabling Meta's competitors to mimic its confidential
				strategies in an effort to attract users or
15				advertisers away from Meta.
16	156	892-5	85-86 ¶ 170 n.364, after "see	This information contains non-public
17			PALM-FTC-00967935), at 366"	information regarding Meta's confidential non-public internal strategic
			300	considerations related to creating value
18				for and attracting users or advertisers to
19				Meta's products or services. This
20				information has never been disclosed publicly. Disclosure of this information
20				would adversely impact Meta's current
21				competitive position by enabling Meta's
22				competitors to mimic its confidential
				strategies in an effort to attract users or advertisers away from Meta.
23		I	1	

24

25

26

1	157	892-5	87-88 ¶ 173, image between "MARCH 2019" and "Source: PALM-006189416-420"	This information contains non-public information regarding Meta's confidential non-public internal strategic
2			17LW-000107+10-420	considerations related to creating value
3				for and attracting users or advertisers to Meta's products or services. This
4				information has never been disclosed
5				publicly. Disclosure of this information would adversely impact Meta's current
6				competitive position by enabling Meta's
7				competitors to mimic its confidential strategies in an effort to attract users or
				advertisers away from Meta.
8				nt Meta Platforms, Inc.'s Motion for
9	Sumn	nary Judgm	ent, Exhibit 5, Expert Rebuttal 9, 2024	Report of Tilman Klumpp, Ph.D., Feb.
10	158	892-5	· · · · · · · · · · · · · · · · · · ·	This information contains confidential,
10	136	092-3	31-32 ¶ 76, between "own internal documents recognize	non-public information regarding Meta's
11				
			that" and "It is also true that, in economics"	internal business strategies and analyses, including summaries and discussions of
12			in economies	Meta's internal modeling and
13				assessments of its products, services, or
14				advertising platform that reveal competitively sensitive information,
15				including how users or advertisers use
				and value Meta's products, services, or advertising platform, how they operate,
16				and potential improvements or other
17				product changes. Disclosure of this non-
18				public information is likely to result in competitive harm to Meta, as it reveals
19				strategic decision-making which, for
				example, could give a developer,
20				advertiser, or business partner unfair leverage in competing against or
21				negotiating with Meta.
22				

24

25

26

159	892-5	31-32 ¶ 76 n.79, between "'CRD update' presentation stating" and "PALM- 005484912 at 921"	This information contains confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
160	892-5	49 ¶ 119, between "Stories ads increased from" and "in 2017 to;" between "in 2017 to" and "in 2020' and that;" between "Stories ads increased from" and "in 2017 to;" and between "in 2017 to" and "in 2020.' He then"	This information contains nonpublic and confidential data or research regarding internal user, transaction, or app performance data, including proprietary methods for obtaining that data or conducting that research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research on U.S. users and advertisers and how they distinguish themselves from Meta in the eyes of U.S. users and advertisers.

1	161	892-5	50 ¶ 122, between "indicates that Facebook was" and	This information contains confidential, non-public information regarding Meta's
2			"during the Class Period"	internal business strategies and analyses,
				including summaries and discussions of
3				Meta's internal modeling and assessments of its products, services, or
4				advertising platform that reveal
5				competitively sensitive information, including how users or advertisers use
6				and value Meta's products, services, or
7				advertising platform, how they operate,
/				and potential improvements or other product changes. Disclosure of this non-
8				public information is likely to result in
9				competitive harm to Meta, as it reveals
10				strategic decision-making which, for example, could give a developer,
10				advertiser, or business partner unfair
11				leverage in competing against or
12	162	892-5	50 © 122 n 142 hetyyeen	negotiating with Meta.
13	102	892-3	50 ¶ 122 n.143, between "PALM-010815939 at 940"	This information contains confidential, non-public information regarding Meta's
			and "PALM-002996507 at	internal business strategies and analyses,
14			slide 20;" and after "PALM-	including summaries and discussions of
15			002996507 at slide 20"	Meta's internal modeling and assessments of its products, services, or
16				advertising platform that reveal
				competitively sensitive information,
17				including how users or advertisers use and value Meta's products, services, or
18				advertising platform, how they operate,
19				and potential improvements or other
				product changes. Disclosure of this non- public information is likely to result in
20				competitive harm to Meta, as it reveals
21				strategic decision-making which, for example, could give a developer,
22				advertiser, or business partner unfair
23				leverage in competing against or negotiating with Meta.
24	163	892-5	50-51 ¶ 123, between "CPM	This information reflects and is
25			for these advertisers and ads" and "Dr. Tadelis' Exhibit 4	calculated from internal, non-public Meta financial data. Were this information to
26			does"	be publicly revealed, it could cause Meta
				competitive harm by giving competitors insight into confidential Meta financial
27				information.
28	No. 3:20-	ev-08570-JD	-81-	DECL. OF AMRISH ACHARYA ISO OMNIBUS

1	164	892-5	71 ¶ 170, between "Meta AN	This information contains nonpublic and
			contributed" and "of	confidential data or research regarding
2			Facebook's total ad	internal user, transaction, or app
3			inventory"	performance data, including proprietary methods for obtaining that data or
3				conducting that research. This
4				information has never been disclosed
_				publicly and Meta's product team treats it
5				as strictly confidential. If publicly
6				revealed, this information could influence
				the competitive decision making and
7				business strategies employed by Meta's
0				competitors, for example by influencing
8				how those competitors conduct market
9				research on U.S. users and advertisers
				and how they distinguish themselves
10				from Meta in the eyes of U.S. users and
11		005.5		advertisers.
11	165	892-5	71-72 ¶ 171, between	This information contains nonpublic and
12			"fluctuated between	confidential data or research regarding
4.0			approximately" and "(roughly	internal user, transaction, or app
13			consistent with the figure;" between "continued to fall,	performance data, including proprietary methods for obtaining that data or
14			reaching" and "of Facebook's	conducting that research. This
11			total impressions;" and image	information has never been disclosed
15			between "TOTAL	publicly and Meta's product team treats it
1.0			FACEBOOK AD	as strictly confidential. If publicly
16			IMPRESSIONS" and	revealed, this information could influence
17			"Source: PALM-017138970"	the competitive decision making and
				business strategies employed by Meta's
18				competitors, for example by influencing
19				how those competitors conduct market
17				research on U.S. users and advertisers
20				and how they distinguish themselves
				from Meta in the eyes of U.S. users and
21				advertisers.
22				
	I			

-82-

28 $\frac{1}{\text{No. }3:20-\text{cv-}08570-\text{JD}}$

23

24

25

26

1	166	892-5	72-73 ¶ 172, between "it still	This information contains nonpublic and
-			fell from approximately" and	confidential data or research regarding
2			"in the months leading up;"	internal user, transaction, or app
2			between "to the GNBA to	performance data, including proprietary
3			about" and "in the months	methods for obtaining that data or
4			after;" and image between "TOTAL FACEBOOK AD	conducting that research. This information has never been disclosed
5			REVENUE" and "Source: PALM-017138970"	publicly and Meta's product team treats it as strictly confidential. If publicly
6				revealed, this information could influence
7				the competitive decision making and business strategies employed by Meta's
				competitors, for example by influencing
8				how those competitors conduct market
9				research on U.S. users and advertisers
				and how they distinguish themselves
10				from Meta in the eyes of U.S. users and
				advertisers.
11	167	892-5	73-74 ¶ 173, between "this	This information contains nonpublic and
12			share was below" and "while	confidential data or research regarding
4.0			it had not been;" between "while it had not been" and	internal user, transaction, or app
13			"in at any time within;" and	performance data, including proprietary methods for obtaining that data or
14			between "TOTAL	conducting that research. This
1.5			FACEBOOK AD CLICKS"	information has never been disclosed
15			and "Source: PALM-	publicly and Meta's product team treats it
16			017138970"	as strictly confidential. If publicly revealed, this information could influence
17				the competitive decision making and
1 /				business strategies employed by Meta's
18				competitors, for example by influencing
19				how those competitors conduct market research on U.S. users and advertisers
				and how they distinguish themselves
20				from Meta in the eyes of U.S. users and
21				advertisers.
22				
	ĺ			

24

25

26

1	168	892-5	81 ¶ 189 n.258, after "PALM-016717997 (5/24/2018)"	This information contains confidential, proprietary, and commercially sensitive
2				information regarding the technical
2				functionalities and processes of Meta's
3				ad auction, ad targeting and delivery systems, or data tables. This information
4				has never been disclosed publicly and
5				Meta's product team treats it as strictly
				confidential. If publicly revealed, this
6				information could influence the competitive decision-making and
7				business strategies employed by Meta's
0				competitors in advertising.
8	169	892-5	81-82 ¶ 190, between	This information contains confidential,
9			"Facebook would have	proprietary, and commercially sensitive information regarding the technical
10			needed" and "Google's documents further indicate"	functionalities and processes of Meta's
				ad auction, ad targeting and delivery
11				systems, or data tables. This information
12				has never been disclosed publicly and
12				Meta's product team treats it as strictly confidential. If publicly revealed, this
13				information could influence the
14				competitive decision-making and
15				business strategies employed by Meta's
	170	892-5	81-82 ¶ 190 n.262, between	competitors in advertising. This information contains confidential,
16	170	092-3	"See PALM-015703568 at	proprietary, and commercially sensitive
17			71-72" and "Emphasis in	information regarding the technical
18			original"	functionalities and processes of Meta's
10				ad auction, ad targeting and delivery systems, or data tables. This information
19				has never been disclosed publicly and
20				Meta's product team treats it as strictly
				confidential. If publicly revealed, this
21				information could influence the competitive decision-making and
22				business strategies employed by Meta's
23				competitors in advertising.
23				

24

25

26

1	171	892-5	87-88 ¶ 202, after "June 14, 2018 Facebook document"	This text contains non-public and confidential information regarding
2			2010 I accook document	Meta's agreements with a non-party
				developer, advertiser, or business partner
3				as well as internal strategy relating to those agreements. Disclosure of this non-
4				public information is likely to result in
5				competitive harm to Meta, as it reveals
				strategic decision-making which, for
6				example, could give a developer, advertiser, or business partner unfair
7				leverage in competing against or
8				negotiating with Meta. Moreover, Meta's
				competitors could use this non-party information to unfairly target Meta's
9				developers, advertisers, or business
10				partners and offer specific deal terms
11				designed to undercut those offered by Meta.
11	172	902.5	00 11 204 - 9 - 114	
12	172	892-5	88 ¶ 204, after "tax on transactions—in fact,"	This text contains non-public and confidential information regarding
13			transactions in fact,	Meta's agreements with a non-party
				developer, advertiser, or business partner
14				as well as internal strategy relating to those agreements. Disclosure of this non-
15				public information is likely to result in
16				competitive harm to Meta, as it reveals
				strategic decision-making which, for
17				example, could give a developer, advertiser, or business partner unfair
18				leverage in competing against or
19				negotiating with Meta. Moreover, Meta's
				competitors could use this non-party information to unfairly target Meta's
20				developers, advertisers, or business
21				partners and offer specific deal terms
22				designed to undercut those offered by Meta.
			<u> </u>	Ivicta.
23				

24

25

26

173	892-5	91 ¶ 210, between "eventually signing the GNBA," and "With the GNBA"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.
174	892-5	93-94 ¶ 215, between "Facebook's internal documents make clear" and "Third, when Facebook signed"	This text contains non-public and confidential information regarding Meta's agreements with a non-party developer, advertiser, or business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developers, advertisers, or business partners and offer specific deal terms designed to undercut those offered by Meta.

1	175	892-5	93-94 ¶ 215 n.301, between "PALM-013771480	This text contains non-public and confidential information regarding
2			(4/15/2019)" and "emphasis	Meta's agreements with a non-party
3			added); PALM-013541405;" and after "emphasis added);	developer, advertiser, or business partner as well as internal strategy relating to
			PALM-013541405"	those agreements. Disclosure of this non-
4				public information is likely to result in competitive harm to Meta, as it reveals
5				strategic decision-making which, for
6				example, could give a developer,
7				advertiser, or business partner unfair leverage in competing against or
8				negotiating with Meta. Moreover, Meta's
				competitors could use this non-party information to unfairly target Meta's
9				developers, advertisers, or business
10				partners and offer specific deal terms designed to undercut those offered by
11				Meta.
12	176	892-5	96 ¶ 220, after "strategy at the	This information contains non-public
13			time) reply as follows:"	information regarding Meta's confidential non-public internal strategic
				considerations related to creating value
14				for and attracting users or advertisers to Meta's products or services. This
15				information has never been disclosed
16				publicly. Disclosure of this information would adversely impact Meta's current
17				competitive position by enabling Meta's
18				competitors to mimic its confidential
				strategies in an effort to attract users or advertisers away from Meta.
19	177	892-5	96 ¶ 221, between "quote	This information contains non-public
20			provided by Dr. Tadelis:" and "Ms. Simo further explains	information regarding Meta's confidential non-public internal strategic
21			that;" and after "Ms. Simo	considerations related to creating value
22			further explains that"	for and attracting users or advertisers to Meta's products or services. This
23				information has never been disclosed
				publicly. Disclosure of this information
24				would adversely impact Meta's current competitive position by enabling Meta's
25				competitors to mimic its confidential
26				strategies in an effort to attract users or advertisers away from Meta.
27			1	

1	178	892-5	96 ¶ 221 n.314, between "PALM-005950959-966 at	This information contains non-public information regarding Meta's
2			963" and "See also"	confidential non-public internal strategic
3				considerations related to creating value for and attracting users or advertisers to
4				Meta's products or services. This
5				information has never been disclosed publicly. Disclosure of this information
				would adversely impact Meta's current
6				competitive position by enabling Meta's competitors to mimic its confidential
7				strategies in an effort to attract users or
8	179	892-5	97 ¶ 222, between " <i>less</i> likely	advertisers away from Meta. This information contains non-public
9	177	0,2 5	for Facebook to" and "I	information regarding Meta's
10			interpret Ms. Simo's response"	confidential non-public internal strategic considerations related to creating value
			response	for and attracting users or advertisers to
11				Meta's products or services. This information has never been disclosed
12				publicly. Disclosure of this information
13				would adversely impact Meta's current
14				competitive position by enabling Meta's competitors to mimic its confidential
15				strategies in an effort to attract users or
16	180	892-5	97 ¶ 223, between "Sandberg,	advertisers away from Meta. This information contains non-public
			stating that" and "Dr. Tadelis	information regarding Meta's
17			puts forth no"	confidential non-public internal strategic considerations related to creating value
18				for and attracting users or advertisers to
19				Meta's products or services. This information has never been disclosed
20				publicly. Disclosure of this information
21				would adversely impact Meta's current competitive position by enabling Meta's
				competitors to mimic its confidential
22				strategies in an effort to attract users or advertisers away from Meta.
23		l	1	aaretiooto amaj mom mom.

24

25

26

1 2 3 4 5 6	181	892-5	98 ¶ 225, after "that's where the demand was,"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's
7				competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
8	182	892-5	98 ¶ 226, after "belying Mr.	This information contains non-public
9			Edie's claim that"	information regarding Meta's confidential non-public internal strategic
10				considerations related to creating value
11				for and attracting users or advertisers to
				Meta's products or services. This information has never been disclosed
12				publicly. Disclosure of this information
13				would adversely impact Meta's current competitive position by enabling Meta's
14				competitive position by chabiling weta's competitors to mimic its confidential
15				strategies in an effort to attract users or
	183	892-5	98-99 ¶ 227, after "This belies	advertisers away from Meta. This information contains non-public
16	103	0,2 3	Mr. Eide's claim that"	information regarding Meta's
17				confidential non-public internal strategic
18				considerations related to creating value for and attracting users or advertisers to
19				Meta's products or services. This
20				information has never been disclosed publicly. Disclosure of this information
				would adversely impact Meta's current
21				competitive position by enabling Meta's competitors to mimic its confidential
22				strategies in an effort to attract users or
23				advertisers away from Meta.

24

25

26

1	184	892-5	99 ¶ 229, between "reduce the budget for original content	This information contains non-public information regarding Meta's
2			and" and "improved user	confidential non-public internal strategic
			engagement;" and between	considerations related to creating value
3			"document suggesting that such" and "Moreover, as	for and attracting users or advertisers to Meta's products or services. This
4			discussed in Section III"	information has never been disclosed
5				publicly. Disclosure of this information
3				would adversely impact Meta's current
6				competitive position by enabling Meta's competitors to mimic its confidential
7				strategies in an effort to attract users or
				advertisers away from Meta.
8	185	892-5	110 ¶ 254, between "to 2017	This information reflects and is
9			represents only" and "of 2017	calculated from internal, nonpublic Meta
10			ad spend;" and between "2018 represents only" and "of 2018	financial data. Meta spends significant resources compiling and maintaining this
			ad spend on"	valuable data, which is non-public, and if
11				revealed to competitors and potential
12				business counterparties, could be used to
13				disadvantage and cause Meta competitive harm by giving competitors insight into
13				confidential Meta financial information.
14				Further, this information reflects
15				sensitive, highly confidential
				characterizations by Meta's internal business teams that, if revealed, could be
16				referenced by potential counterparties in
17				negotiations with Meta to gain an unfair
18				advantage against Meta.
10				
19				

21

22

23

24

25

26

186	892-5	110 ¶ 255, between "data and calculations, the" and "figures he discusses are based on a;" between "figures he discusses are based on a" and "increase in Netflix ad spend;" between "from 2016 to 2017 and a" and "increase in Netflix ad spend;" between "Facebook in 2017 and 2018—" and "respectively—shows;" between "Netflix's ad spend accounted for" and "of the total spend on ad venues;" between "market in 2017, and for" and "in 2018. Moreover, if the;" between "in 2018. Moreover, if the;" between "in 2018. Moreover, if the" and "Netflix spent on advertising;" and between "would have amounted to between" and "of revenue increase"	This information reflects and is calculated from internal, nonpublic Meta financial data. Meta spends significant resources compiling and maintaining this valuable data, which is non-public, and if revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information. Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair advantage against Meta.
187	892-5	116-17 ¶ 270, between "A January 28, 2015" and "All of these features would"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations.

-91-

188	892-5	128 ¶ 303, between "injected by F3 for CTR_MBL_FEED" and "Dr. Tadelis cites a second;" between "which explains that" and "I do not know if;" between "I do not know if" and "whether 'features backfilled;" between "most features of F3, or what" and "refers to;" between "as measured by Meta's" and "they only support a finding of a;" between "they only support a finding of a" and "and only for;" and after "and only for"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
189	892-5	129 ¶ 306 n.431, after "removing duplicative features',"	This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad auction, ad targeting and delivery systems, or data tables. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors in advertising.
190	892-5	135-36 ¶ 319 n.450, after "See PALM-FTC-00967935), at 366"	This text contains non-public and confidential information regarding risks, priorities, and internal strategy relating to advertising on Meta's products, including with respect to specific advertisers or specific types of advertisers. If publicly revealed, this information could cause Meta competitive harm by giving other parties insight into Meta's strategic considerations and thus a competitive advantage over Meta in ongoing or future business negotiations.

No. 3:20-cv-08570-JD

1 2	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 6, Expert Merits Report of Markus Jakobsson, Ph.D., dated Jan. 12, 2024						
2	191	892-7	20-21 ¶ 57, between "had	This text details the strategy and			
3		,	developed a so-called" and	proprietary sources and methods for			
4			"architecture in which Onavo-	gathering market research. This			
7			installed;" between "so that	information contains nonpublic and			
5			Onavo's" and "As a Facebook engineer explained;" and after	confidential research regarding app performance data and competitive			
6			"and Ken Rudin:"	analysis, including proprietary methods			
				for obtaining that data or conducting that			
7				research, and proprietary, confidential			
8				research into potential methodologies for conducting market research. This			
9				information has never been disclosed			
10				publicly and Meta's product team treats it as strictly confidential. If publicly			
11				revealed, this information could influence			
				the competitive decision-making and business strategies employed by Meta's			
12				competitors, for example by influencing			
13				how those competitors conduct market			
				research and how they distinguish			
14				themselves from Meta. This information contains nonpublic and confidential			
15				research regarding competitive analysis.			
16				This information has never been			
1.7				disclosed publicly and Meta's product team treats it as strictly confidential. If			
17				publicly revealed, this information could			
18				influence the competitive decision-			
19				making and business strategies employed			
1)				by Meta's competitors, for example by			
20				influencing how those competitors conduct market research and how they			
21				distinguish themselves from Meta.			
22							
23							
24							
25							
23							

27

19	_ 1	892-7	22 5 6 2 11 4 4	
			22 ¶ 60, after "behavioral information such as"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
19	13	892-7	24 ¶ 68, between "specific inapp analytics—" and "—that he believed would"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

1	194	892-7	24-25 ¶ 68, image snip between "figure out how to do	This information contains non-public information regarding Meta's
2			this" and "PX 2255 at PALM-016564836"	confidential non-public internal strategic considerations related to creating value
3			010304630	for and attracting users or advertisers to
4				Meta's products or services. This information has never been disclosed
5				publicly. Disclosure of this information
6				would adversely impact Meta's current competitive position by enabling Meta's
				competitors to mimic its confidential
7				strategies in an effort to attract users or advertisers away from Meta.
8	195	892-7	25-26 ¶ 70, between "URLs	This text details the strategy and
9			are unfortunately	proprietary sources and methods for
10			uninformative." and "That said—we are"	gathering market research. This information contains nonpublic and
10			said—we are	confidential research regarding app
11				performance data and competitive
12				analysis, including proprietary methods
				for obtaining that data or conducting that
13				research, and proprietary, confidential research into potential methodologies for
14				conducting market research. This
1.5				information has never been disclosed
15				publicly and Meta's product team treats it
16				as strictly confidential. If publicly revealed, this information could influence
17				the competitive decision-making and
				business strategies employed by Meta's
18				competitors, for example by influencing
19				how those competitors conduct market research and how they distinguish
20				themselves from Meta. This information
21				contains nonpublic and confidential research regarding competitive analysis.
22				This information has never been
22				disclosed publicly and Meta's product team treats it as strictly confidential. If
23				publicly revealed, this information could
24				influence the competitive decision-
25				making and business strategies employed by Meta's competitors, for example by
				influencing how those competitors
26				conduct market research and how they
27			<u> </u>	distinguish themselves from Meta.

1	196	892-7	35 ¶ 94, image between "companies' valuable	This text details the strategy and proprietary sources and methods for
2			analytics." and "PX 414 at 6"	gathering market research. This
2			unaryties. und 171 11 ut 0	information contains nonpublic and
3				confidential research regarding app
				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that research, and proprietary, confidential
				research into potential methodologies for
6				conducting market research. This
7				information has never been disclosed
				publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
				research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product team treats it as strictly confidential. If
				publicly revealed, this information could
16				influence the competitive decision-
17				making and business strategies employed
17				by Meta's competitors, for example by
18				influencing how those competitors
				conduct market research and how they
19				distinguish themselves from Meta.
20				
20				
21				

23

24

25

26

1	197	892-7	48 ¶ 125, image snip between	This text details the strategy and
			""a good job there." and "PX 1747 at PALM-017114236"	proprietary sources and methods for gathering market research. This
2			1/4/ at FALWI-01/114230	information contains nonpublic and
3				confidential research regarding app
5				performance data and competitive
4				analysis, including proprietary methods
_				for obtaining that data or conducting that
5				research, and proprietary, confidential
6				research into potential methodologies for
				conducting market research. This
7				information has never been disclosed
8				publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
1.0				the competitive decision-making and
10				business strategies employed by Meta's competitors, for example by influencing
11				how those competitors conduct market
				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could
10				influence the competitive decision-
17				making and business strategies employed
1.0				by Meta's competitors, for example by
18				influencing how those competitors
19				conduct market research and how they distinguish themselves from Meta.
				distinguish themselves from wieta.
20				
21				
∠1				

23

24

25

26

l	1	1	1
198	892-7	50 ¶ 129, image snip between "Sending message" and "We used it to measure"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
199	892-7	52-53 ¶ 133, between "Amazon Ads metrics including" and "PX 2256 at PALM-012863801 (Jan. 2019 IAAP Technical Analysis)," encompassing image; and image between "PX 2256 at PALM-012863801 (Jan. 2019 IAAP Technical Analysis)" and "PX 1208 at PALM- 014364032-33"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

200	892-7	53 ¶ 134, between "YouTube, including" and image beginning "YouTube what data is sent back;" and image snip between "video_type (ad or content)" and "PX 2256 at PALM-012863800 (Jan. 2019 IAAP Technical Analysis)"	This text details the strategy and proprietary sources and methods for gathering market research. This information contains nonpublic and confidential research regarding app performance data and competitive analysis, including proprietary methods for obtaining that data or conducting that research, and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta.
201	892-7	54-55 ¶ 138, image between "PALM-016895582 at 5584- 85" and "Id. at PALM- 016895585"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

202	892-7	Ph.D., Feb. 9, 23 ¶ 62 n.25, after	
202	892-7	"(Zuckerberg, Jun. 2016:"	This information contains non-public information regarding Meta's confidential non-public internal strate considerations related to creating value for and attracting users or advertisers Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's curre competitive position by enabling Meta competitors to mimic its confidential strategies in an effort to attract users advertisers away from Meta.
203	892-7	24 ¶ 63, between "You should figure out how to do this." and "This seems like an important"	This information contains non-public information regarding Meta's confidential non-public internal strate considerations related to creating value for and attracting users or advertisers Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's curre competitive position by enabling Meta competitors to mimic its confidential strategies in an effort to attract users advertisers away from Meta.

22

23

24

25

26

1	204	892-7	25-26 ¶ 66, between	This text details the strategy and
1			"unfortunately	proprietary sources and methods for
2			uninformative." and "That	gathering market research. This
			said—we are"	information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
7				analysis, including proprietary methods
5				for obtaining that data or conducting that research, and proprietary, confidential
6				research into potential methodologies for
				conducting market research. This
7				information has never been disclosed
8				publicly and Meta's product team treats it
0				as strictly confidential. If publicly
9				revealed, this information could influence
				the competitive decision-making and
10				business strategies employed by Meta's competitors, for example by influencing
11				how those competitors conduct market
				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
1.5				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could
				influence the competitive decision-
17				making and business strategies employed by Meta's competitors, for example by
18				influencing how those competitors
10				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
22				
23				

25

26

1	205	892-7	27-28 ¶ 71, image after "this	This text details the strategy and
1			at enough detail'"	proprietary, confidential research into
2				potential methodologies for conducting
3				market research. This information has never been disclosed publicly and Meta's
4				product team treats it as strictly
4				confidential. If publicly revealed, this
5				information could influence the competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
9				contains nonpublic and confidential
				research regarding competitive analysis.
10				This information has never been
11				disclosed publicly and Meta's product team treats it as strictly confidential. If
				publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
				by Meta's competitors, for example by
14				influencing how those competitors conduct market research and how they
15				distinguish themselves from Meta.
16				
17				
1 /				
18				
19				

21

22

23

24

25

26

1	206	892-7	33-34 ¶ 77, image after "of	This text details the strategy and
			IAAP-derived data"	proprietary sources and methods for
2				gathering market research. This
3				information contains nonpublic and confidential research regarding app
3				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This information has never been disclosed
8				publicly and Meta's product team treats it as strictly confidential. If publicly
9				revealed, this information could influence
				the competitive decision-making and
10				business strategies employed by Meta's
11				competitors, for example by influencing
11				how those competitors conduct market research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
14				research regarding competitive analysis. This information has never been
1.5				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could influence the competitive decision-
17				making and business strategies employed
18				by Meta's competitors, for example by influencing how those competitors
				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
22				

23

24

25

26

1 2 3	207	892-7	34-35 ¶ 78, after "Patel, and others, explained:"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's
4				product team treats it as strictly confidential. If publicly revealed, this
5				information could influence the competitive decision-making and
6				business strategies employed by Meta's competitors, for example by influencing
7 8				how those competitors conduct market research and how they distinguish
9				themselves from Meta. This information contains nonpublic and confidential
10				research regarding competitive analysis. This information has never been
11				disclosed publicly and Meta's product team treats it as strictly confidential. If
12				publicly revealed, this information could influence the competitive decision-
13				making and business strategies employed by Meta's competitors, for example by
14				influencing how those competitors conduct market research and how they
15				distinguish themselves from Meta.
16 17				
18				
10				

1	208	892-7	35-36 ¶ 79, between "propose	This text details the strategy and
1			that Facebook" and "The	proprietary, confidential research into
2			second option is;" and	potential methodologies for conducting
3			between "The second option is" and "by Naveh, Priell,"	market research. This information has never been disclosed publicly and Meta's
4				product team treats it as strictly confidential. If publicly revealed, this
5				information could influence the competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
9				contains nonpublic and confidential
10				research regarding competitive analysis. This information has never been
11				disclosed publicly and Meta's product team treats it as strictly confidential. If
12				publicly revealed, this information could
13				influence the competitive decision- making and business strategies employed
14				by Meta's competitors, for example by influencing how those competitors
14				conduct market research and how they
15				distinguish themselves from Meta.
16				
17				
18				
19				
20				
21				

 $\frac{1}{1000} = \frac{1}{1000} = \frac{1$

No. 3:20-cv-08570-JD

22

23

24

25

26

1	209	892-7	36-37 ¶ 80, between "In	This text details the strategy and
			particular, the first option—"	proprietary, confidential research into
2			and "—is something that no legitimate"	potential methodologies for conducting market research. This information has
3			regitimate	never been disclosed publicly and Meta's
4				product team treats it as strictly confidential. If publicly revealed, this
5				information could influence the competitive decision-making and
6				business strategies employed by Meta's
				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
9				contains nonpublic and confidential
10				research regarding competitive analysis. This information has never been
				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could influence the competitive decision-
13				making and business strategies employed
				by Meta's competitors, for example by
14				influencing how those competitors conduct market research and how they
15				distinguish themselves from Meta.
16				
17				
18				
19				

21

22

23

24

25

26

27

-106-

1	210	892-7	37 ¶ 81, between "option—the	This text details the strategy and
			one" and "by Erez Naveh;" and after "team recommends	proprietary, confidential research into potential methodologies for conducting
2			that Facebook"	market research. This information has
3				never been disclosed publicly and Meta's
4				product team treats it as strictly confidential. If publicly revealed, this
_				information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing how those competitors conduct market
8				research and how they distinguish
				themselves from Meta. This information contains nonpublic and confidential
9				research regarding competitive analysis.
10				This information has never been
11				disclosed publicly and Meta's product team treats it as strictly confidential. If
12				publicly revealed, this information could influence the competitive decision-
13				making and business strategies employed
13				by Meta's competitors, for example by
14				influencing how those competitors
15				conduct market research and how they distinguish themselves from Meta.
16		•		
1.7				
17				
18				
19				
20				

27 No. 3:20-cy-0

No. 3:20-cv-08570-JD

21

22

23

24

25

1	211	892-7	37 ¶ 82, between "I refer to" and "that Facebook's Erez	This text details the strategy and proprietary, confidential research into
2 3			Naveh;" between "zero day' because a" and "that would	potential methodologies for conducting market research. This information has
4			allow a developer like Facebook to;" and between	never been disclosed publicly and Meta's product team treats it as strictly
5			"that would allow a developer like Facebook to" and "to	confidential. If publicly revealed, this information could influence the
6			avoid certificate pinning"	competitive decision-making and business strategies employed by Meta's
7				competitors, for example by influencing how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
9				contains nonpublic and confidential research regarding competitive analysis.
10				This information has never been disclosed publicly and Meta's product
11				team treats it as strictly confidential. If publicly revealed, this information could
12 13				influence the competitive decision- making and business strategies employed
14				by Meta's competitors, for example by influencing how those competitors
15				conduct market research and how they distinguish themselves from Meta.
16				
17				
18				
19				
20				
21				
22 23				
24				
25				
26				
27				
28	No. 3:20-	ev-08570-JD	-108-	DECL. OF AMRISH ACHARYA ISO OMNIBUS

1	212	892-7	38 ¶ 84, between "Naveh and	This text details the strategy and
2			Priell" and "that if Snapchat implements;" and between	proprietary, confidential research into potential methodologies for conducting
3			"its analytics, Facebook" and ", all so that Facebook can	market research. This information has never been disclosed publicly and Meta's
4			continue"	product team treats it as strictly
				confidential. If publicly revealed, this information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's competitors, for example by influencing
7				how those competitors conduct market research and how they distinguish
8				themselves from Meta. This information
9				contains nonpublic and confidential research regarding competitive analysis.
10				This information has never been disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could influence the competitive decision-
13				making and business strategies employed
14				by Meta's competitors, for example by influencing how those competitors
15				conduct market research and how they distinguish themselves from Meta.
16				
17				
18				
19				
20				
21				
22				
23				
	1			

24

25

26

1	213	892-7	38 ¶ 85, between "their	This text details the strategy and
			recommended option—" and	proprietary, confidential research into
2			"However, as a 'Con,' they recognize that;" and after	potential methodologies for conducting market research. This information has
3			""However, as a 'Con,' they	never been disclosed publicly and Meta's
4			recognize that"	product team treats it as strictly
4				confidential. If publicly revealed, this
5				information could influence the competitive decision-making and
6				business strategies employed by Meta's
				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
9				contains nonpublic and confidential
9				research regarding competitive analysis.
10				This information has never been
11				disclosed publicly and Meta's product team treats it as strictly confidential. If
10				publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
14				by Meta's competitors, for example by influencing how those competitors
				conduct market research and how they
15				distinguish themselves from Meta.
16				
17				
18				
19				
20				
21				
<i>L</i> 1				

-110-

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

22

23

24

25

26

1	214	892-7	38-39 ¶ 86, between	This text details the strategy and
1			"involv[ing]' in the" and "in	proprietary, confidential research into
2			their August 29"	potential methodologies for conducting
3				market research. This information has never been disclosed publicly and Meta's
4				product team treats it as strictly
7				confidential. If publicly revealed, this
5				information could influence the
6				competitive decision-making and business strategies employed by Meta's
_				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
				contains nonpublic and confidential
9				research regarding competitive analysis.
10				This information has never been
10				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
1.4				by Meta's competitors, for example by
14				influencing how those competitors conduct market research and how they
15				distinguish themselves from Meta.
1.6				was an end of the first trees.
16				
17				
18				
19				
- /	I			

21

22

23

24

25

26

1	215	892-7	39-40 ¶ 87, between "Priell	This text details the strategy and
1			about 30 days prior:" and	proprietary, confidential research into
2			"The fact that Facebook	potential methodologies for conducting
			would"	market research. This information has
3				never been disclosed publicly and Meta's
4				product team treats it as strictly
4				confidential. If publicly revealed, this
5				information could influence the
				competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing
/				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
				contains nonpublic and confidential
9				research regarding competitive analysis.
10				This information has never been
10				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
				publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
13				by Meta's competitors, for example by
14				influencing how those competitors
				conduct market research and how they
15				distinguish themselves from Meta.
16				
10				
17				
4.0				
18				
19				
1)				

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	216	892-7	40 ¶ 88, after "discussion that included the following:"	This text details the strategy and proprietary, confidential research into potential methodologies for conducting market research. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they distinguish themselves from Meta. This information contains nonpublic and confidential research regarding competitive analysis. This information has never been disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors conduct market research and how they
				distinguish themselves from Meta.
16				
17				
18				
19				

-113-

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

20

21

22

23

24

25

26

1	217	892-7	41 ¶ 90, between "suspect acts, including" and "in order	This text details the strategy and proprietary, confidential research into
2			to continue Facebook's"	potential methodologies for conducting
				market research. This information has
3				never been disclosed publicly and Meta's product team treats it as strictly
4				confidential. If publicly revealed, this
5				information could influence the
				competitive decision-making and business strategies employed by Meta's
6				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
0				contains nonpublic and confidential
9				research regarding competitive analysis.
10				This information has never been
11				disclosed publicly and Meta's product team treats it as strictly confidential. If
12				publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed by Meta's competitors, for example by
14				influencing how those competitors
15				conduct market research and how they
13				distinguish themselves from Meta.
16				
17				
18				
19				
19				

20

21

22

23

24

25

26

1	218	892-7	48 ¶ 108, between "dollars to deploy it, and then" and	This text details the strategy and proprietary, confidential research into
2			"when this bespoke technical"	potential methodologies for conducting
			_	market research. This information has
3				never been disclosed publicly and Meta's
4				product team treats it as strictly
7				confidential. If publicly revealed, this information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's
7				competitors, for example by influencing how those competitors conduct market
8				research and how they distinguish
				themselves from Meta. This information contains nonpublic and confidential
9				research regarding competitive analysis.
10				This information has never been
1.1				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could influence the competitive decision-
13				making and business strategies employed
13				by Meta's competitors, for example by
14				influencing how those competitors
15				conduct market research and how they
13	210	902.7	52 ft 115 1	distinguish themselves from Meta.
16	219	892-7	52 ¶ 115, between "the Snapchat app, including" and	This information contains non-public information regarding Meta's
17			"—was, according to the"	confidential non-public internal strategic considerations related to creating value
18				for and attracting users or advertisers to
19				Meta's products or services. This information has never been disclosed
20				publicly. Disclosure of this information
				would adversely impact Meta's current
21				competitive position by enabling Meta's competitors to mimic its confidential
22				strategies in an effort to attract users or
23				advertisers away from Meta.
24				

25

26

1	220	892-7	53 ¶ 117, image after "in the same document:"	This document is the performance review of an employee not named in this lawsuit.
2				Its disclosure would publicize employee
3				performance matters with no relevance to the case and violate the reasonable
3				expectation that Meta would maintain the
4				confidentiality of this information. This
5				document also details the strategy and
6				proprietary sources and methods for gathering market research. This
6				information contains nonpublic and
7				confidential research regarding app
8				performance data and competitive
				analysis, including proprietary methods for obtaining that data or conducting that
9				research, and proprietary, confidential
10				research into potential methodologies for
11				conducting market research. This
11				information has never been disclosed publicly and Meta's product team treats it
12				as strictly confidential. If publicly
13				revealed, this information could influence
				the competitive decision-making and
14				business strategies employed by Meta's competitors, for example by influencing
15				how those competitors conduct market
16				research and how they distinguish
10				themselves from Meta. This information
17				contains nonpublic and confidential research regarding competitive analysis.
18				This information has never been
				disclosed publicly and Meta's product
19				team treats it as strictly confidential. If
20				publicly revealed, this information could influence the competitive decision-
21				making and business strategies employed
				by Meta's competitors, for example by
22				influencing how those competitors
23				conduct market research and how they distinguish themselves from Meta.
24		l	l	and and the members of from Free.
∠ '1				

25

26

1	221	892-7	59-60 ¶ 139, between	This text details the strategy and
			"recommended that	proprietary, confidential research into
2			Facebook" and "as a response	potential methodologies for conducting
3			to potential certificate"	market research. This information has
3				never been disclosed publicly and Meta's product team treats it as strictly
4				confidential. If publicly revealed, this
_				information could influence the
5				competitive decision-making and
6				business strategies employed by Meta's
_				competitors, for example by influencing
7				how those competitors conduct market
8				research and how they distinguish themselves from Meta. This information
				contains nonpublic and confidential
9				research regarding competitive analysis.
10				This information has never been
10				disclosed publicly and Meta's product
11				team treats it as strictly confidential. If
12				publicly revealed, this information could
12				influence the competitive decision-
13				making and business strategies employed
1.4				by Meta's competitors, for example by influencing how those competitors
14				conduct market research and how they
15				distinguish themselves from Meta.
16				
17				
10				
18				
19				
20				

21

22

23

24

25

26

		efendant Meta Platforms, Inc.'s Motion for gment, Exhibit 10
222 892-9	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely result in competitive harm to Meta, as it reveals strategic decision-making, which for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to
Advertiser	Plaintiffs' Opposition to De	unfairly target Meta's developer. sfendant Meta Platforms, Inc.'s Motion for
7 tu v Ci tisci		gment, Exhibit 11
223 892-9	Entire document	This information contains non-public are confidential data regarding indevelopment or unreleased user or advertising products, features, or business plans for Meta's products or services. This information has never be disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information coul influence the competitive decision-making and business strategies employed by Meta's competitors, for example by influencing how those competitors market themselves to U.S. users or advertisers and how they distinguish themselves from Meta in the eyes of U. users or advertisers.

-118-

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 13, PX-2857 Priell Deposition					
2	224	892-9	Entire document	This text details the strategy and		
2				proprietary sources and methods for		
3				gathering market research. This		
4				information contains nonpublic and confidential research regarding app		
5				performance data and competitive		
				analysis, including proprietary methods		
6				for obtaining that data or conducting that		
7				research, and proprietary, confidential research into potential methodologies for		
0				conducting market research. This		
8				information has never been disclosed		
9				publicly and Meta's product team treats it		
10				as strictly confidential. If publicly revealed, this information could influence		
10				the competitive decision-making and		
11				business strategies employed by Meta's		
12				competitors, for example by influencing		
				how those competitors conduct market		
13				research and how they distinguish themselves from Meta. This information		
14				contains nonpublic and confidential		
1.5				research regarding competitive analysis.		
15				This information has never been		
16				disclosed publicly and Meta's product team treats it as strictly confidential. If		
17				publicly revealed, this information could		
				influence the competitive decision-		
18				making and business strategies employed		
19				by Meta's competitors, for example by influencing how those competitors		
				conduct market research and how they		
20				distinguish themselves from Meta.		
21						
22						
23						

25

26

	A	lvertiser Pl	aintiffs' Opposition to Defenda	nt Meta Platforms, Inc.'s Motion for		
1	Summary Judgment, Exhibit 14, PX-414 Olivan Deposition					
2	225	892-9	PALM-010629831-832,	This text details the strategy and		
2			content of "Friday, July 22,	proprietary sources and methods for		
3			2016 8:33 AM" email below	gathering market research. This		
4			subject line "A/C Priv -	information contains nonpublic and		
1			Onavo Research Taskforce	confidential research regarding app		
5			Status Update"	performance data and competitive		
				analysis, including proprietary methods		
6				for obtaining that data or conducting that		
7				research, and proprietary, confidential research into potential methodologies for		
,				conducting market research. This		
8				information has never been disclosed		
				publicly and Meta's product team treats it		
9				as strictly confidential. If publicly		
10				revealed, this information could influence		
				the competitive decision-making and		
11				business strategies employed by Meta's		
12				competitors, for example by influencing		
12				how those competitors conduct market		
13				research and how they distinguish		
				themselves from Meta. This information		
14				contains nonpublic and confidential		
15				research regarding competitive analysis.		
				This information has never been		
16				disclosed publicly and Meta's product team treats it as strictly confidential. If		
17				publicly revealed, this information could		
1 /				influence the competitive decision-		
18				making and business strategies employed		
				by Meta's competitors, for example by		
19				influencing how those competitors		
20				conduct market research and how they		
20				distinguish themselves from Meta.		
21						
22						
22						
23						
24						
25						

27

1	226	892-9	Email addresses of Meta employees as highlighted in	This text reveals email addresses of current or former employees of Meta.
2			exhibit	These current or former employees have
3				a legitimate, legally recognized privacy interest in protecting their contact
				information from public disclosure. If
4				their contact information were to be publicly disclosed, they may be subject to
5				repeated inquiries from the press or
6				members of the general public, which could rise to the level of threats or
7				harassment, given the current media
8				attention on Meta.
	227	892-9	1-6, entire slides with notes following "Document	This text details the strategy and proprietary sources and methods for
9			produced only in native	gathering market research. This
10			format."	information contains nonpublic and
11				confidential research regarding app performance data and competitive
				analysis, including proprietary methods
12				for obtaining that data or conducting that
13				research, and proprietary, confidential
14				research into potential methodologies for conducting market research. This
				information has never been disclosed
15				publicly and Meta's product team treats it as strictly confidential. If publicly
16				revealed, this information could influence
17				the competitive decision-making and business strategies employed by Meta's
18				competitors, for example by influencing
19				how those competitors conduct market research and how they distinguish
20				themselves from Meta. This information
21				contains nonpublic and confidential research regarding competitive analysis.
22				This information has never been disclosed publicly and Meta's product
				team treats it as strictly confidential. If
23				publicly revealed, this information could influence the competitive decision-
24				making and business strategies employed
25				by Meta's competitors, for example by influencing how those competitors
26				conduct market research and how they
27				distinguish themselves from Meta.

1	Ac		aintiffs' Opposition to Defenda nary Judgment, Exhibit 15, PX-	nt Meta Platforms, Inc.'s Motion for 2256 Zuckerberg Deposition
2	228	892-9	PALM-012863800 between	This text details the strategy and
2			"everything we collected is	proprietary sources and methods for
3			still there" and "Per	gathering market research. This
4			App/Dataset Info"	information contains nonpublic and
				confidential research regarding app performance data and competitive
5				analysis, including proprietary methods
6				for obtaining that data or conducting that
				research, and proprietary, confidential
7				research into potential methodologies for
8				conducting market research. This
0				information has never been disclosed
9				publicly and Meta's product team treats it
10				as strictly confidential. If publicly
10				revealed, this information could influence the competitive decision-making and
11				business strategies employed by Meta's
10				competitors, for example by influencing
12				how those competitors conduct market
13				research and how they distinguish
				themselves from Meta. This information
14				contains nonpublic and confidential
15				research regarding competitive analysis.
13				This information has never been
16				disclosed publicly and Meta's product team treats it as strictly confidential. If
17				publicly revealed, this information could
1 /				influence the competitive decision-
18				making and business strategies employed
10				by Meta's competitors, for example by
19				influencing how those competitors
20				conduct market research and how they
21				distinguish themselves from Meta.
21				decision-making
22				

24

25

26

1	229	892-9	PALM-012863800 between	This text details the strategy and
1			"video_type (ad or content)"	proprietary sources and methods for
2			and "Snapchat"	gathering market research. This
				information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that
				research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This information has never been disclosed
/				
8				publicly and Meta's product team treats it as strictly confidential. If publicly
				revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
10				competitors, for example by influencing
11				how those competitors conduct market
				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could
10				influence the competitive decision-
17				making and business strategies employed
				by Meta's competitors, for example by
18				influencing how those competitors
19				conduct market research and how they
17				distinguish themselves from Meta.
20				
21				
<u> </u>				
22				

23

24

25

26

1	230	892-9	PALM-012863801 before	This text details the strategy and
1			"We used it to measure"	proprietary sources and methods for
2				gathering market research. This
2				information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive analysis, including proprietary methods
				for obtaining that data or conducting that
5				research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This
7				information has never been disclosed
8				publicly and Meta's product team treats it as strictly confidential. If publicly
0				revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
				themselves from Meta. This information contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
17				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
1.0				publicly revealed, this information could
16				influence the competitive decision-
17				making and business strategies employed
				by Meta's competitors, for example by
18				influencing how those competitors
19				conduct market research and how they
1)				distinguish themselves from Meta.
20				
21				
22				

23

24

25

26

1	231	892-9	PALM-012863801 between	This text details the strategy and
2			"raw form by MS team and others" and "Summary of	proprietary sources and methods for gathering market research. This
2			types of analyses conducted"	information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive analysis, including proprietary methods
				for obtaining that data or conducting that
5				research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This information has never been disclosed
				publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
10				the competitive decision-making and business strategies employed by Meta's
				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish themselves from Meta. This information
13				contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product team treats it as strictly confidential. If
1.6				publicly revealed, this information could
16				influence the competitive decision-
17				making and business strategies employed
18				by Meta's competitors, for example by influencing how those competitors
				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
22				
23				
24				
25				

26

1	232	892-9	PALM-012863802-823,	This text details the strategy and
1			everything after "Appendix:	proprietary sources and methods for
2			VPNLess - VPNLess.key	gathering market research. This
3			Contact Support"	information contains nonpublic and
3				confidential research regarding app performance data and competitive
4				analysis, including proprietary methods
_				for obtaining that data or conducting that
5				research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This
/				information has never been disclosed publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
11				competitors, for example by influencing
11				how those competitors conduct market research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
				research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product team treats it as strictly confidential. If
				publicly revealed, this information could
16				influence the competitive decision-
17				making and business strategies employed
				by Meta's competitors, for example by
18				influencing how those competitors
19				conduct market research and how they distinguish themselves from Meta. This
20				text reveals personal information about
20				current or former employees of Meta.
21				These current or former employees have
22				a legitimate, legally recognized privacy
22				interest in protecting their contact information from public disclosure.
23		1		information from paone discressire.
24				
∠¬ r				
25				
26				

1	Ac	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 16				
2	233	892-9	Email addresses of Meta	This text reveals email addresses of		
3			employees as highlighted in exhibit	current or former employees of Meta. These current or former employees have		
۱				a legitimate, legally recognized privacy interest in protecting their contact		
				information from public disclosure. If		
				their contact information were to be publicly disclosed, they may be subject to		
				repeated inquiries from the press or		
				members of the general public, which could rise to the level of threats or		
				harassment, given the current media attention on Meta.		
	Ac	l dvertiser Pl	 aintiffs' Opposition to Defenda	ant Meta Platforms, Inc.'s Motion for		
			ary Judgment, Exhibit 18, PX			
	234	892-9	Email addresses of Meta employees as highlighted in	This text reveals email addresses of current or former employees of Meta.		
			exhibit	These current or former employees have		
				a legitimate, legally recognized privacy interest in protecting their contact		
				information from public disclosure. If their contact information were to be		
				publicly disclosed, they may be subject to		
				repeated inquiries from the press or members of the general public, which		
				could rise to the level of threats or		
				harassment, given the current media attention on Meta.		
	L	<u> </u>	1			

22

23

24

25

26

	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for					
1	Summary Judgment, Exhibit 19, PX-2984 Zervas Deposition					
2	235	892-9	Entire document	This document is the performance review		
3				of an employee not named in this lawsuit.		
3				Its disclosure would publicize employee performance matters with no relevance to		
4				the case and violate the reasonable		
5				expectation that Meta would maintain the		
3				confidentiality of this information. This		
6				document also details the strategy and		
7				proprietary sources and methods for		
7				gathering market research. This		
8				information contains nonpublic and		
_				confidential research regarding app performance data and competitive		
9				analysis, including proprietary methods		
10				for obtaining that data or conducting that		
				research, and proprietary, confidential		
11				research into potential methodologies for		
12				conducting market research. This		
				information has never been disclosed		
13				publicly and Meta's product team treats it		
14				as strictly confidential. If publicly revealed, this information could influence		
				the competitive decision-making and		
15				business strategies employed by Meta's		
16				competitors, for example by influencing		
				how those competitors conduct market		
17				research and how they distinguish		
18				themselves from Meta. This information contains nonpublic and confidential		
				research regarding competitive analysis.		
19				This information has never been		
20				disclosed publicly and Meta's product		
				team treats it as strictly confidential. If		
21				publicly revealed, this information could		
22				influence the competitive decision- making and business strategies employed		
				by Meta's competitors, for example by		
23				influencing how those competitors		
24				conduct market research and how they		
				distinguish themselves from Meta.		
25						
2.5						

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 20, PX-2861 Priell Deposition				
2	236	892-9	Email addresses of Meta	This text reveals email addresses of	
			employees as highlighted in	current or former employees of Meta.	
3			exhibit	These current or former employees have	
4				a legitimate, legally recognized privacy	
•				interest in protecting their contact	
5				information from public disclosure. If their contact information were to be	
6				publicly disclosed, they may be subject to	
0				repeated inquiries from the press or	
7				members of the general public, which	
				could rise to the level of threats or	
8				harassment, given the current media	
9				attention on Meta.	
	Ac	lvertiser Pla	aintiffs' Opposition to Defenda	nt Meta Platforms, Inc.'s Motion for	
10		1	Summary Judgment	t, Exhibit 21	
11	237	892-10	Entire document	This document contains nonpublic and	
11				confidential data or research regarding	
12				internal user data, including proprietary	
13				methods for obtaining that data or	
13				conducting that research. This information has never been disclosed	
14				publicly and the Meta's product team	
1.5				treats it as strictly confidential. If	
15				publicly revealed, this information could	
16				influence the competitive decision-	
				making and business strategies employed	
17				by Meta's competitors, for example by	
18				influencing how those competitors	
10				conduct market research.	
19	Ac			nt Meta Platforms, Inc.'s Motion for	
20	238	892-10	nmary Judgment, Exhibit 24, I PALM-014640333-338,	This text describes bilateral meetings	
20	238	892-10	between "DAVOS -	with government officials as well as	
21			GOVERNMENT	senior executives from current and	
22			MEETINGS" and "Other	potential business partners of Meta. This	
22			Meetings"	text contains confidential, non-public	
23			_	information regarding a non-party and	
2.4				implicates the nonparty's confidentiality	
24				interests, by revealing the identity of an	
25				individual who is not a party to this	
				litigation, and who has a reasonable	
26				expectation that Meta will maintain the confidentiality of statements made during	
27				potential partnership conversations.	
- '		I		potential partitolism conversations.	

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 26				
2	239	892-10	Entire document	This information reveals Meta's internal non-public profit, revenue, and financial	
3				calculations. These figures are not	
4				otherwise publicly reported by the company and their disclosure is likely to	
5				cause Meta competitive harm and give its competitors an unfair advantage. Meta's	
6				competitors could improperly utilize this	
7				internal, non-public data to modify or augment their business operations in an	
8				effort to compete unfairly against Meta. Moreover, visibility into the trends in the	
9				data (i.e., figures across multiple years)	
10				gives Meta's competitors improper insight into the financial health and	
11				future outlook of Meta's product development or advertising business,	
12				which also arguably gives Meta's	
12	Λ.	Ivantican Dl	intiffs! Opposition to Defende	competitors an unfair advantage. nt Meta Platforms, Inc.'s Motion for	
13	A	ivertiser i i	Summary Judgment		
14	240	892-10	Email addresses of Meta	This text reveals email addresses of	
15			employees as highlighted in exhibit	current or former employees of Meta. These current or former employees have	
16			omnor.	a legitimate, legally recognized privacy	
17				interest in protecting their contact information from public disclosure. If	
18				their contact information were to be publicly disclosed, they may be subject to	
19				repeated inquiries from the press or	
20				members of the general public, which could rise to the level of threats or	
21				harassment, given the current media attention on Meta.	
22					

23

24

25

26

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 29, PX-116 Parikh Deposition				
2	241	892-10	Email addresses of Meta	This text reveals email addresses of	
3			employees as highlighted in	current or former employees of Meta.	
			exhibit	These current or former employees have a legitimate, legally recognized privacy	
4				interest in protecting their contact	
5				information from public disclosure. If	
6				their contact information were to be publicly disclosed, they may be subject to	
				repeated inquiries from the press or	
7				members of the general public, which	
8				could rise to the level of threats or harassment, given the current media	
9				attention on Meta.	
	242	892-10	PALM-012927516, between	This information contains non-public	
10			"Pedro Canahuati (1/30/2019	information regarding Meta's	
11			11:38:19 PST):" and "Pedro Canahuati (1/30/2019	confidential non-public internal strategic considerations related to creating value	
12			11:38:32 PST);" between	for and attracting users or advertisers to	
12			"Pedro Canahuati (1/30/2019	Meta's products or services. This	
13			11:38:32 PST):" and "Jay	information has never been disclosed	
14			Parikh (1/30/2019 11:39:13 PST);" and between "Pedro	publicly. Disclosure of this information would adversely impact Meta's current	
1.5			Canahuati (1/30/2019	competitive position by enabling Meta's	
15			11:39:15 PST):" and "Jay	competitors to mimic its confidential	
16			Parikh (1/30/2019 11:39:30 PST):"	strategies in an effort to attract users or advertisers away from Meta.	
17	243	892-10	PALM-012927516, between	This information contains non-public	
		0,2 10	"Jay Parikh (1/30/2019	information regarding Meta's	
18			11:39:40 PST):" and "Jay	confidential non-public internal strategic	
19			Parikh (1/30/2019 11:40:18 PST):"	considerations related to creating value for and attracting users or advertisers to	
20			151).	Meta's products or services. This	
21				information has never been disclosed	
				publicly. Disclosure of this information would adversely impact Meta's current	
22				competitive position by enabling Meta's	
23				competitors to mimic its confidential	
24				strategies in an effort to attract users or advertisers away from Meta.	
24				auvertisers away moin ivieta.	

25

26

	Su	mmary Judgment, Exhibit 32,	-
244	892-10	Email addresses of Meta employees as highlighted in	This text reveals email addresses of current or former employees of Meta.
		exhibit	These current or former employees have
			a legitimate, legally recognized privacy interest in protecting their contact
			information from public disclosure. If
			their contact information were to be
			publicly disclosed, they may be subject to repeated inquiries from the press or
			members of the general public, which
			could rise to the level of threats or harassment, given the current media
			attention on Meta.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 34 PX-1747 Wei Deposition			
245	892-10	Email addresses of Meta	This text reveals email addresses of
		employees as highlighted in	current or former employees of Meta.
		exhibit	These current or former employees have a legitimate, legally recognized privacy
			interest in protecting their contact
			information from public disclosure. If their contact information were to be
			publicly disclosed, they may be subject to
			repeated inquiries from the press or
			members of the general public, which could rise to the level of threats or
			harassment, given the current media
			attention on Meta.

23

24

25

26

1	Ac	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 36					
2	246	892-10	Entire document	This text details the strategy and			
3				proprietary sources and methods for			
3				gathering market research. This information contains nonpublic and			
4				confidential research regarding app			
5				performance data and competitive			
				analysis, including proprietary methods			
6				for obtaining that data or conducting that			
7				research, and proprietary, confidential			
				research into potential methodologies for conducting market research. This			
8				information has never been disclosed			
9				publicly and Meta's product team treats it			
				as strictly confidential. If publicly			
10				revealed, this information could influence			
11				the competitive decision-making and business strategies employed by Meta's			
				competitors, for example by influencing			
12				how those competitors conduct market			
13				research and how they distinguish			
				themselves from Meta. This information			
14				contains nonpublic and confidential			
15				research regarding competitive analysis. This information has never been			
16				disclosed publicly and Meta's product			
16				team treats it as strictly confidential. If			
17				publicly revealed, this information could			
10				influence the competitive decision-			
18				making and business strategies employed by Meta's competitors, for example by			
19				influencing how those competitors			
20				conduct market research and how they			
20				distinguish themselves from Meta			
21							
22							

-133-

28 $\frac{1}{\text{No. } 3:20-\text{cv-}08570-\text{JD}}$

23

24

25

26

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 40				
2	247	892-10	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information regarding a non-party developer and	
5				implicates their confidentiality interests,	
6				by revealing the identity of a Meta developer, who is not party to this	
7				litigation, and who has a reasonable expectation that Meta will maintain the	
8				confidentiality of contractual terms and	
9				its own confidential statements made during negotiations. Further, disclosure	
10				of this non-public information is likely to result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which,	
12				for example, could give a competitor or potential business partner unfair leverage	
13				in competing against or negotiating with Meta. Moreover, Meta's competitors	
				could use this non-party information to	
14				unfairly target Meta's developer.	
15					
16					
17					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 41				
2	248	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information regarding a non-party developer and	
5				implicates their confidentiality interests, by revealing the identity of a Meta	
6				developer, who is not party to this	
7				litigation, and who has a reasonable expectation that Meta will maintain the	
8				confidentiality of contractual terms and its own confidential statements made	
9				during negotiations. Further, disclosure	
10				of this non-public information is likely to result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which, for example, could give a competitor or	
12				potential business partner unfair leverage in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors	
14				could use this non-party information to unfairly target Meta's developer.	
15					
16					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 42				
2	249	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information	
5				regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta	
6				developer, who is not party to this	
7				litigation, and who has a reasonable expectation that Meta will maintain the	
8				its own confidential statements made	
9				during negotiations. Further, disclosure	
10				of this non-public information is likely to result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which, for example, could give a competitor or	
12				potential business partner unfair leverage in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors	
14				could use this non-party information to unfairly target Meta's developer.	
15					
16					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 43				
2	250	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information	
4				regarding a non-party developer and	
5				implicates their confidentiality interests,	
				by revealing the identity of a Meta	
6				developer, who is not party to this	
_				litigation, and who has a reasonable	
7				expectation that Meta will maintain the	
8				confidentiality of contractual terms and	
0				its own confidential statements made	
9				during negotiations. Further, disclosure	
				of this non-public information is likely to	
10				result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which,	
11				for example, could give a competitor or	
12				potential business partner unfair leverage	
				in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors	
1.4				could use this non-party information to	
14				unfairly target Meta's developer.	
15					
16					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 44				
2	251	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information	
				regarding a non-party developer and implicates their confidentiality interests,	
5				by revealing the identity of a Meta	
6				developer, who is not party to this	
7				litigation, and who has a reasonable expectation that Meta will maintain the	
8				confidentiality of contractual terms and	
9				its own confidential statements made during negotiations. Further, disclosure	
9				of this non-public information is likely to	
10				result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which, for example, could give a competitor or	
12				potential business partner unfair leverage	
				in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors could use this non-party information to	
14				unfairly target Meta's developer.	
15					
16					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 45				
2	252	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information regarding a non-party developer and	
5				implicates their confidentiality interests,	
6				by revealing the identity of a Meta developer, who is not party to this	
7				litigation, and who has a reasonable expectation that Meta will maintain the	
8				confidentiality of contractual terms and its own confidential statements made	
9				during negotiations. Further, disclosure	
10				of this non-public information is likely to result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which, for example, could give a competitor or	
12				potential business partner unfair leverage in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors	
14				could use this non-party information to unfairly target Meta's developer.	
15					
16					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 46				
2	253	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information regarding a non-party developer and	
5				implicates their confidentiality interests, by revealing the identity of a Meta	
6				developer, who is not party to this	
7				litigation, and who has a reasonable expectation that Meta will maintain the	
8				confidentiality of contractual terms and its own confidential statements made	
9				during negotiations. Further, disclosure	
10				of this non-public information is likely to result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which, for example, could give a competitor or	
12				potential business partner unfair leverage	
13				in competing against or negotiating with Meta. Moreover, Meta's competitors	
14				could use this non-party information to unfairly target Meta's developer.	
15		1	1	many mgermen a developer.	
16					
17					
1 /					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 47			
2	254	892-11	Entire document	This document is a confidential
				agreement between Meta and an app
3				developer. This text contains
4				confidential, non-public information
4				regarding a non-party developer and
5				implicates their confidentiality interests,
				by revealing the identity of a Meta
6				developer, who is not party to this
7				litigation, and who has a reasonable expectation that Meta will maintain the
				confidentiality of contractual terms and
8				its own confidential statements made
9				during negotiations. Further, disclosure
				of this non-public information is likely to
10				result in competitive harm to Meta, as it
11				reveals strategic decision-making, which,
11				for example, could give a competitor or
12				potential business partner unfair leverage
1.2				in competing against or negotiating with Meta. Moreover, Meta's competitors
13				could use this non-party information to
14				unfairly target Meta's developer.
	A	dvertiser Pl	aintiffs' Opposition to Defenda	nt Meta Platforms, Inc.'s Motion for
15			Summary Judgment	t, Exhibit 48
16	255	892-11	Entire document	This text contains confidential, non-
17				public information regarding a business
1 /				partner and implicates the nonparty's confidentiality interests, by revealing the
18				identity of a Meta business partner who is
19				not a party to this litigation, and who has
20				a reasonable expectation that Meta will maintain the confidentiality of
21				contractual terms and its own
21				confidential statements made during
22				negotiations.
23				
24				
24				

-141-

25

26

1	A	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 49				
2	256	892-11	Entire document	This document is a confidential		
				agreement between Meta and an app		
3				developer. This text contains		
4				confidential, non-public information		
				regarding a non-party developer and		
5				implicates their confidentiality interests,		
6				by revealing the identity of a Meta developer, who is not party to this		
0				litigation, and who has a reasonable		
7				expectation that Meta will maintain the		
				confidentiality of contractual terms and		
8				its own confidential statements made		
9				during negotiations. Further, disclosure		
				of this non-public information is likely to		
10				result in competitive harm to Meta, as it		
11				reveals strategic decision-making, which,		
11				for example, could give a competitor or		
12				potential business partner unfair leverage		
				in competing against or negotiating with		
13				Meta. Moreover, Meta's competitors could use this non-party information to		
14				unfairly target Meta's developer.		
1				unianty arget wiea s developer.		
15						
16						
16						

1	A	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 50				
2	257	892-11	Entire document	This document is a confidential		
3				agreement between Meta and an app		
				developer. This text contains confidential, non-public information		
4				regarding a non-party developer and		
5				implicates their confidentiality interests,		
				by revealing the identity of a Meta		
6				developer, who is not party to this		
7				litigation, and who has a reasonable expectation that Meta will maintain the		
				confidentiality of contractual terms and		
8				its own confidential statements made		
9				during negotiations. Further, disclosure		
10				of this non-public information is likely to		
10				result in competitive harm to Meta, as it reveals strategic decision-making, which,		
11				for example, could give a competitor or		
12				potential business partner unfair leverage		
				in competing against or negotiating with		
13				Meta. Moreover, Meta's competitors could use this non-party information to		
14				unfairly target Meta's developer.		
15						
13						
16						
17						

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 51					
2	258	892-11	Entire document	This document is a confidential		
2	236	092-11	Entire document	agreement between Meta and an app		
3				developer. This text contains		
				confidential, non-public information		
4				regarding a non-party developer and		
5				implicates their confidentiality interests,		
				by revealing the identity of a Meta		
6				developer, who is not party to this		
7				litigation, and who has a reasonable		
/				expectation that Meta will maintain the		
8				confidentiality of contractual terms and		
				its own confidential statements made		
9				during negotiations. Further, disclosure of this non-public information is likely to		
10				result in competitive harm to Meta, as it		
10				reveals strategic decision-making, which,		
11				for example, could give a competitor or		
10				potential business partner unfair leverage		
12				in competing against or negotiating with		
13				Meta. Moreover, Meta's competitors		
				could use this non-party information to		
14				unfairly target Meta's developer.		
15						
13						
16						

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 52				
2	259	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information	
4				regarding a non-party developer and	
5				implicates their confidentiality interests,	
6				by revealing the identity of a Meta developer, who is not party to this	
				litigation, and who has a reasonable	
7				expectation that Meta will maintain the	
8				confidentiality of contractual terms and its own confidential statements made	
9				during negotiations. Further, disclosure	
9				of this non-public information is likely to	
10				result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which, for example, could give a competitor or	
10				potential business partner unfair leverage	
12				in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors	
14				could use this non-party information to unfairly target Meta's developer.	
14				umanty target wieta's developer.	
15					
16					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 53					
2	260	892-11	Entire document	This document is a confidential		
3				agreement between Meta and an app developer. This text contains		
4				confidential, non-public information		
4				regarding a non-party developer and		
5				implicates their confidentiality interests,		
6				by revealing the identity of a Meta developer, who is not party to this		
0				litigation, and who has a reasonable		
7				expectation that Meta will maintain the		
8				confidentiality of contractual terms and		
0				its own confidential statements made		
9				during negotiations. Further, disclosure		
10				of this non-public information is likely to result in competitive harm to Meta, as it		
				reveals strategic decision-making, which,		
11				for example, could give a competitor or		
12				potential business partner unfair leverage		
				in competing against or negotiating with		
13				Meta. Moreover, Meta's competitors could use this non-party information to		
14				unfairly target Meta's developer.		
15		1				
13						
16						

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 54				
2	261	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information	
5				regarding a non-party developer and implicates their confidentiality interests,	
3				by revealing the identity of a Meta	
6				developer, who is not party to this	
7				litigation, and who has a reasonable expectation that Meta will maintain the	
8				confidentiality of contractual terms and	
				its own confidential statements made	
9				during negotiations. Further, disclosure of this non-public information is likely to	
10				result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which, for example, could give a competitor or	
12				potential business partner unfair leverage	
				in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors could use this non-party information to	
14				unfairly target Meta's developer.	
15					
16					
17					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 55				
2	262	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app	
3				developer. This text contains confidential, non-public information	
4				regarding a non-party developer and	
5				implicates their confidentiality interests,	
				by revealing the identity of a Meta	
6				developer, who is not party to this litigation, and who has a reasonable	
7				expectation that Meta will maintain the	
				confidentiality of contractual terms and	
8				its own confidential statements made	
9				during negotiations. Further, disclosure	
10				of this non-public information is likely to result in competitive harm to Meta, as it	
10				reveals strategic decision-making, which,	
11				for example, could give a competitor or	
12				potential business partner unfair leverage	
12				in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors	
14				could use this non-party information to unfairly target Meta's developer.	
				unianty anger from a developer.	
15					
16					
-					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 56				
2	263	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information	
_				regarding a non-party developer and	
5				implicates their confidentiality interests,	
				by revealing the identity of a Meta	
6				developer, who is not party to this	
7				litigation, and who has a reasonable expectation that Meta will maintain the	
8				confidentiality of contractual terms and	
				its own confidential statements made	
9				during negotiations. Further, disclosure	
10				of this non-public information is likely to result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which, for example, could give a competitor or	
				potential business partner unfair leverage	
12				in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors	
14				could use this non-party information to unfairly target Meta's developer.	
		1		J 0 1 1	
15					
16					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 57				
2	264	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
				confidential, non-public information	
4				regarding a non-party developer and	
5				implicates their confidentiality interests,	
				by revealing the identity of a Meta	
6				developer, who is not party to this	
_				litigation, and who has a reasonable	
7				expectation that Meta will maintain the	
8				confidentiality of contractual terms and	
0				its own confidential statements made	
9				during negotiations. Further, disclosure	
4.0				of this non-public information is likely to	
10				result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which,	
11				for example, could give a competitor or	
12				potential business partner unfair leverage	
1.0				in competing against or negotiating with Meta. Moreover, Meta's competitors	
13				could use this non-party information to	
14				unfairly target Meta's developer.	
1 1				amany arget with a developer.	
15					
1.6					
16					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 58				
2	265	892-11	Entire document	This document is a confidential	
3				agreement between Meta and an app developer. This text contains	
4				confidential, non-public information	
5				regarding a non-party developer and implicates their confidentiality interests,	
6				by revealing the identity of a Meta developer, who is not party to this	
7				litigation, and who has a reasonable expectation that Meta will maintain the	
8				confidentiality of contractual terms and its own confidential statements made	
9				during negotiations. Further, disclosure	
10				of this non-public information is likely to result in competitive harm to Meta, as it	
11				reveals strategic decision-making, which, for example, could give a competitor or	
12				potential business partner unfair leverage in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors	
14				could use this non-party information to unfairly target Meta's developer.	
15					
16					

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 59				
2	266	892-11	Entire document	This document is a confidential	
2		0,2 11	Zimire decument	agreement between Meta and an app	
3				developer. This text contains	
4				confidential, non-public information	
7				regarding a non-party developer and	
5				implicates their confidentiality interests,	
6				by revealing the identity of a Meta developer, who is not party to this	
0				litigation, and who has a reasonable	
7				expectation that Meta will maintain the	
0				confidentiality of contractual terms and	
8				its own confidential statements made	
9				during negotiations. Further, disclosure	
1.0				of this non-public information is likely to	
10				result in competitive harm to Meta, as it reveals strategic decision-making, which,	
11				for example, could give a competitor or	
10				potential business partner unfair leverage	
12				in competing against or negotiating with	
13				Meta. Moreover, Meta's competitors	
				could use this non-party information to	
14				unfairly target Meta's developer.	
15					
16					

-152-

- 11				
1	Ac		aintiffs' Opposition to Defenda mmary Judgment, Exhibit 61 P	nt Meta Platforms, Inc.'s Motion for
<u>, </u>	267	892-12	Entire document	This document is a confidential
2	207	892-12	Entire document	
3				agreement between Meta and an app
				developer. This text contains confidential, non-public information
				regarding a non-party developer and
				implicates their confidentiality interests,
				by revealing the identity of a Meta
				developer, who is not party to this
				litigation, and who has a reasonable
				expectation that Meta will maintain the
				confidentiality of contractual terms and
				its own confidential statements made
				during negotiations. Further, disclosure of this non-public information is likely to
				result in competitive harm to Meta, as it
				reveals strategic decision-making, which,
				for example, could give a competitor or
				potential business partner unfair leverage
				in competing against or negotiating with
				Meta. Moreover, Meta's competitors
				could use this non-party information to
	A	ı « Di		unfairly target Meta's developer.
	A	ivertiser Pla	aintiffs' Opposition to Defenda Summary Judgment	nt Meta Platforms, Inc.'s Motion for
ŀ	268	892-12	T	Т
	208	092-12	PALM-012438856-858, between "Section 2: The	This text describes specific contract terms between Meta and app developers.
			Standard Terms of the	This text contains confidential, non-
			Company's Agreements or	public information regarding a non-party
			licenses with Application	developer. Disclosure of this non-public
			Developers" and "Section 3:	information is likely to result in
			Integration Partnerships"	competitive harm to Meta, as it reveals strategic decision-making, which, for
				example, could give a competitor or
				potential business partner unfair leverage in competing against or negotiating with
				Meta. Moreover, Meta's competitors
				could use this non-party information to
				unfairly target Meta's developers.
		•		

-153-

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 64					
2	269	892-12	Entire document	This document is a confidential		
				agreement between Meta and an app		
3				developer. This text contains		
4				confidential, non-public information		
4				regarding a non-party developer and		
5				implicates their confidentiality interests,		
				by revealing the identity of a Meta		
6				developer, who is not party to this		
				litigation, and who has a reasonable		
7				expectation that Meta will maintain the		
				confidentiality of contractual terms and		
8				its own confidential statements made		
9				during negotiations. Further, disclosure		
9				of this non-public information is likely to		
10				result in competitive harm to Meta, as it		
				reveals strategic decision-making, which,		
11				for example, could give a competitor or		
				potential business partner unfair leverage		
12				in competing against or negotiating with		
13				Meta. Moreover, Meta's competitors		
13				could use this non-party information to		
14				unfairly target Meta's developer.		
1.			.1	amany augernious sucretoper.		
15						
16						

Ac	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 65				
270	892-12	Entire document	This document is a confidential agreement between Meta and an app developer. This text contains confidential, non-public information regarding a non-party developer and implicates their confidentiality interests, by revealing the identity of a Meta developer, who is not party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making, which, for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer.		
Ac	dvertiser Pl		nt Meta Platforms, Inc.'s Motion for		
271	892-12	Entire document	This document describes specific contract terms between Meta and Google. This text contains non-public and confidential information regarding Meta's agreements with a business partner as well as internal strategy relating to those agreements. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give an ad venue unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's business partners and offer specific deal terms designed to undercut those offered by Meta.		

1	A	dvertiser Pl	aintiffs' Opposition to Defend Summary Judgme	lant Meta Platforms, Inc.'s Motion for ent, Exhibit 68
2	272	892-12	Entire document	This text details the strategy and
3				proprietary sources and methods for
				gathering market research. This information contains nonpublic and
4				confidential research regarding app
5				performance data and competitive
6				analysis, including proprietary methods for obtaining that data or conducting that
7				research, and proprietary, confidential
				research into potential methodologies for conducting market research. This
8				information has never been disclosed
9				publicly and Meta's product team treats it
10				as strictly confidential. If publicly revealed, this information could influence
				the competitive decision-making and
11				business strategies employed by Meta's
12				competitors, for example by influencing how those competitors conduct market
13				research and how they distinguish
				themselves from Meta. This information
14				contains nonpublic and confidential research regarding competitive analysis.
15				This information has never been
16				disclosed publicly and Meta's product
17				team treats it as strictly confidential. If publicly revealed, this information could
18				influence the competitive decision-
				making and business strategies employed by Meta's competitors, for example by
19				influencing how those competitors
20				conduct market research and how they
21				distinguish themselves from Meta.
22				
23				

25

26

1	Ac		aintiffs' Opposition to Defenda nary Judgment, Exhibit 70 PX-	nt Meta Platforms, Inc.'s Motion for 1295 Jakubowski Deposition
2	273	892-12	Entire document	This document describes the negotiation
3				of specific contract terms between Meta and Google. This text contains non-
				public and confidential information
4				regarding Meta's agreements with a
5				business partner as well as internal strategy relating to those agreements.
6				Disclosure of this non-public information
7				is likely to result in competitive harm to
7				Meta, as it reveals strategic decision- making which, for example, could give
8				an ad venue or business partner unfair
9				leverage in competing against or
10				negotiating with Meta. Moreover, Meta's competitors could use this non-party
10				information to unfairly target Meta's
11				business partners and offer specific deal
12				terms designed to undercut those offered
13	Ac	lvertiser Pl	aintiffs' Opposition to Defenda	by Meta. nt Meta Platforms, Inc.'s Motion for
	710	avertiser i i	Summary Judgment	
14	274	892-12	Entire document	This document describes specific
15				contract terms between Meta and Google. This text contains non-public and
16				confidential information regarding
				Meta's agreements with a business
17				partner as well as internal strategy relating to those agreements. Disclosure
18				of this non-public information is likely to
19				result in competitive harm to Meta, as it
20				reveals strategic decision-making which, for example, could give an ad venue
20				unfair leverage in competing against or
21				negotiating with Meta. Moreover, Meta's
22				competitors could use this non-party information to unfairly target Meta's
23				business partners and offer specific deal
				terms designed to undercut those offered
24				by Meta.
25				
26				

1	Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for Summary Judgment, Exhibit 72, PX-1711 Crum Deposition						
2	275	892-12	Email addresses of Meta	This text reveals email addresses of			
3			employees as highlighted in exhibit	current or former employees of Meta.			
4			exhibit	These current or former employees have a legitimate, legally recognized privacy			
5				interest in protecting their contact information from public disclosure. If			
6				their contact information were to be publicly disclosed, they may be subject to			
7				repeated inquiries from the press or			
				members of the general public, which could rise to the level of threats or			
8				harassment, given the current media			
9				attention on Meta.			
10	Ac		aintiffs' Opposition to Defenda mmary Judgment, Exhibit 73, I	nt Meta Platforms, Inc.'s Motion for PX-1712 Crum Deposition			
11	276	892-12	Entire document	This document describes specific			
				contract terms between Meta and Google.			
12				This text contains non-public and confidential information regarding			
13				Meta's agreements with a business			
14				partner as well as internal strategy			
				relating to those agreements. Disclosure of this non-public information is likely to			
15				result in competitive harm to Meta, as it			
16				reveals strategic decision-making which, for example, could give an ad venue			
17				unfair leverage in competing against or			
18				negotiating with Meta. Moreover, Meta's competitors could use this non-party			
19				information to unfairly target Meta's business partners and offer specific deal			
20				terms designed to undercut those offered			
21				by Meta.			
22							
23							

25

26

	Plaintiffs' Opposition to Defenda nmary Judgment, Exhibit 74, P	ant Meta Platforms, Inc.'s Motion for X-1922 Sandberg Deposition
277 892-12	Entire document	This document details confidential, non-public information regarding Meta's internal business strategies and analyses, including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
		ant Meta Platforms, Inc.'s Motion for
278 892-12	Email addresses of Meta employees as highlighted in exhibit	This text reveals email addresses of current or former employees of Meta. These current or former employees have a legitimate, legally recognized privacy interest in protecting their contact information from public disclosure. If their contact information were to be publicly disclosed, they may be subject to repeated inquiries from the press or members of the general public, which could rise to the level of threats or harassment, given the current media attention on Meta.

1	279	892-12	PALM-006209593, between "We've negotiated a	This text contains non-public and confidential information regarding
2			partnership with" and "We're nearly ready to sign;" and	Meta's agreements with a business partner as well as internal strategy
3			between "Here's a high-level summary" and "-Dan" of	relating to those agreements. Disclosure of this non-public information is likely to
4			"March 16, 2018 12:34 PM"	result in competitive harm to Meta, as it
5			email	reveals strategic decision-making which, for example, could give an ad venue
6				unfair leverage in competing against or negotiating with Meta. Moreover, Meta's
7				competitors could use this non-party
8				information to unfairly target Meta's business partners and offer specific deal
9				terms designed to undercut those offered by Meta.
10	280	892-12	PALM-006209594, between	This information reflects and is
11			"Today" and "AN is sub scale because it;" and between	calculated from internal, non-public Meta financial data. Were this information to
12			"Future" and "How do we sclae to achieve goal" of	be publicly revealed, it could cause Meta competitive harm by giving competitors
13			"February 27, 2018 at 4:33 AM" email	insight into confidential Meta financial information.
14	281	892-12	PALM-006209594, between "(and get our fair share of	This text contains non-public and confidential information regarding
15			publisher ecosystem)" and "of	Meta's agreements with a business
16			the \$52B publisher ecosystem" of "February 27,	partner as well as internal strategy relating to those agreements. Disclosure
17			2018 at 4:33 AM" email	of this non-public information is likely to result in competitive harm to Meta, as it
18				reveals strategic decision-making which,
19				for example, could give an ad venue unfair leverage in competing against or
20				negotiating with Meta. Moreover, Meta's competitors could use this non-party
21				information to unfairly target Meta's
22				business partners and offer specific deal terms designed to undercut those offered
23				by Meta.

 $28 \parallel_{\frac{N_0}{N_0}}$

24

25

26

1	282	892-12	PALM-006209595, between "Criteo and MediaNet would	This text contains non-public and confidential information regarding
2			be launch partners." and	Meta's agreements with a business
_			"What happens if we don't	partner as well as internal strategy
3			follow recommendation to	relating to those agreements. Disclosure
4			partner with ad tech" of "February 27, 2018 at 4:33	of this non-public information is likely to result in competitive harm to Meta, as it
5			AM" email	reveals strategic decision-making which,
5				for example, could give an ad venue
6				unfair leverage in competing against or
_				negotiating with Meta. Moreover, Meta's
7				competitors could use this non-party
8				information to unfairly target Meta's
				business partners and offer specific deal terms designed to undercut those offered
9				by Meta.
10	283	892-12	PALM-006209595-596,	This text contains non-public and
10	203	072-12	between "tax at the end of the	confidential information regarding
11			first term (3.5 yrs)" and	Meta's agreements with a business
10			"Partners renege on their	partner as well as internal strategy
12			contractual obligations;"	relating to those agreements. Disclosure
13			between "training data for	of this non-public information is likely to
			their ad systems." and "Optics	result in competitive harm to Meta, as it
14			of partnering with Google in	reveals strategic decision-making which,
15			market;" between "Optics of partnering with Google in	for example, could give an ad venue unfair leverage in competing against or
16			market" and "Contracted	negotiating with Meta. Moreover, Meta's
10			payments to Google;" and	competitors could use this non-party
17			between "Contracted	information to unfairly target Meta's
10			payments to Google" and	business partners and offer specific deal
18			"From: Henry Erskine Crum"	terms designed to undercut those offered
19			of "February 27, 2018 at 4:33	by Meta.
			AM" email	
20				

21

22

23

24

25

26

1	284	892-12	PALM-006209596-597,	This text contains non-public and
2			between "(where the market is growing)," and "of the \$52B	confidential information regarding Meta's agreements with a business
			publisher ecosystem;" and	partner as well as internal strategy
3			between "and the monetary	relating to those agreements. Disclosure
4			investment required for (2)." and "Thanks! Henry" of	of this non-public information is likely to result in competitive harm to Meta, as it
			"February 26, 2018 at 23:42"	reveals strategic decision-making which,
5			email	for example, could give an ad venue
6				unfair leverage in competing against or
7				negotiating with Meta. Moreover, Meta's competitors could use this non-party
8				information to unfairly target Meta's
8				business partners and offer specific deal
9				terms designed to undercut those offered by Meta.
10	285	892-12	PALM-006209600-613, entire	This information contains confidential,
1.1			slides	non-public information regarding Meta's
11				internal business strategies and analyses,
12				including summaries and discussions of Meta's internal modeling and
13				assessments of its products, services, or
				advertising platform that reveal
14				competitively sensitive information,
15				including how users or advertisers use and value Meta's products, services, or
16				advertising platform, how they operate,
10				and potential improvements or other
17				product changes. Disclosure of this non-
18				public information is likely to result in competitive harm to Meta, as it reveals
				strategic decision-making which, for
19				example, could give a developer,
20				advertiser, or business partner unfair leverage in competing against or
21				negotiating with Meta.
	Ac	lvertiser Pla	aintiffs' Opposition to Defenda	nt Meta Platforms, Inc.'s Motion for
22			Summary Judgment	
23	286	892-13	PALM-011831167-168 ¶ 6,	This information reflects and is
24			after "Re-Authorization of Equity Subcommittee	calculated from internal, non-public Meta financial data. Were this information to
			Delegation"	be publicly revealed, it could cause Meta
25				competitive harm by giving competitors
26				insight into confidential Meta financial
				information.
27				

No. 3:20-cv-08570-JD

1	287	892-13	PALM-011831168-169 ¶ 7, after "Equity Pool Evergreen	This information reflects and is calculated from internal, non-public Meta
2			Increase"	financial data. Were this information to be publicly revealed, it could cause Meta
3				competitive harm by giving competitors
4				insight into confidential Meta financial information.
5	288	892-13	PALM-011831171 at Exhibit A, after "Approved	This information reflects and is calculated from internal, non-public Meta
6			Expenditures"	financial data. Were this information to
7				be publicly revealed, it could cause Meta competitive harm by giving competitors
8				insight into confidential Meta financial information.
9	289	892-13	PALM-011831190, row 4 of	This text reveals confidential information
10			column 5 (Reed Hastings), below "Netflix"	regarding Netflix's spend on Meta. This text contains confidential, non-public
11				information regarding an advertiser and implicates their confidentiality interests,
12				by revealing the confidential business information of a Meta advertiser who is
13				not party to this litigation, and who has a
14				reasonable expectation that Meta will maintain the confidentiality of
15				contractual terms and its own confidential statements made during
16				negotiations. Further, disclosure of this
17				non-public information is likely to result in competitive harm to Meta, as it reveals
18				strategic decision-making, which, for example, could give a competitor or
19				potential business partner unfair leverage
20				in competing against or negotiating with Meta. Moreover, Meta's competitors
21				could use this non-party information to unfairly target Meta's advertiser.
				unianty target wieta's advertiser.
22				

23

24

25

1	A	dvertiser Pl	aintiffs' Opposition to Defenda Summary Judgment	nt Meta Platforms, Inc.'s Motion for
2	290	892-13	PALM-016986654-655,	This document describes the negotiation
3		072-13	between "here's what they	of specific contract terms between Meta and Netflix. This text contains non-
4			want from us," and "Susan" of "February 18, 2015 at 7:04	public and confidential information
5			PM" email	regarding Meta's agreements with a non- party developer, advertiser, or business
6				partner as well as internal strategy relating to those agreements. Disclosure
7				of this non-public information is likely to
8				result in competitive harm to Meta, as it reveals strategic decision-making which,
9				for example, could give an developer, advertiser, or business partner unfair
				leverage in competing against or
10				negotiating with Meta. Moreover, Meta's
11				competitors could use this non-party information to unfairly target Meta's
12				developers, advertisers, or business
10				partners and offer specific deal terms designed to undercut those offered by
13				Meta. This text also contains
14				confidential, proprietary, and
15				commercially sensitive information regarding the technical functionalities
16				and processes of Meta's ad targeting and delivery systems. If publicly revealed,
17				this information could influence the
18				competitive decision-making and business strategies employed by Meta's
				competitors in advertising.
19	291	892-13	Email addresses of Meta	This text reveals email addresses of
20			employees as highlighted in exhibit	current or former employees of Meta. These current or former employees have
21				a legitimate, legally recognized privacy interest in protecting their contact
22				information from public disclosure. If
23				their contact information were to be publicly disclosed, they may be subject to
24				repeated inquiries from the press or members of the general public, which
25				could rise to the level of threats or
26				harassment, given the current media attention on Meta.
27		<u> </u>		and the same

No. 3:20-cv-08570-JD

Advertiser		efendant Meta Platforms, Inc.'s Motion for lgment, Exhibit 92
292 892-13	Entire document	This document describes confidential financial information and data, and sensitive product strategy discussions. This information reflects and is calculated from internal, nonpublic Met financial data. Meta spends significant resources compiling and maintaining th valuable data, which is non-public, and revealed to competitors and potential business counterparties, could be used to disadvantage and cause Meta competitive harm by giving competitors insight into confidential Meta financial information Further, this information reflects sensitive, highly confidential characterizations by Meta's internal business teams that, if revealed, could be referenced by potential counterparties in negotiations with Meta to gain an unfair
Advortisor	Plaintiffs! Opposition to De	advantage against Meta.
Auveruser		efendant Meta Platforms, Inc.'s Motion for Igment, Exhibit 93
293 892-13	Entire document	This document reveals Meta's internal non-public profit, revenue, and financia calculations. These data sets are not otherwise publicly reported by the company and their disclosure is likely to cause Meta competitive harm and give it competitors an unfair advantage. Meta's competitors could improperly utilize this internal, non-public data to modify or augment their business operations in an effort to compete unfairly against Meta. Moreover, visibility into the trends in the data (i.e., figures across multiple years) gives Meta's competitors improper insight into the financial health and future outlook of Meta's product development or advertising business, which also arguably gives Meta's competitors an unfair advantage.

1	Ac	dvertiser Pla	aintiffs' Opposition to Defenda Summary Judgment	nt Meta Platforms, Inc.'s Motion for t, Exhibit 94
2	294	892-13	Entire document	This document describes proprietary
3				market research and analysis on a Meta
3				competitor. This text contains non-public and confidential information regarding
4				Meta's agreements with an advertiser as
5				well as internal strategy relating to those
6				agreements. Disclosure of this non-public information is likely to result in
0				competitive harm to Meta, as it reveals
7				strategic decision-making which, for
8				example, could give an advertiser unfair
				leverage in competing against or negotiating with Meta. Moreover, Meta's
9				competitors could use this non-party
10				information to unfairly target Meta's
11				advertisers and offer specific deal terms
				designed to undercut those offered by Meta.
12	A	l dvertiser Pla	aintiffs' Opposition to Defenda	nt Meta Platforms, Inc.'s Motion for
13			mmary Judgment, Exhibit 95, 1	
14	295	892-13	Email addresses of Meta	This text reveals email addresses of
			employees as highlighted in exhibit	current or former employees of Meta. These current or former employees have
15			CAMOIL	a legitimate, legally recognized privacy
16				interest in protecting their contact
17				information from public disclosure. If
1 /				their contact information were to be publicly disclosed, they may be subject to
18				repeated inquiries from the press or
19				members of the general public, which
				could rise to the level of threats or
20				harassment, given the current media attention on Meta.
21	296	892-13	PALM-014546138, between	This text contains non-public and
22			"we learned of two key	confidential information regarding risks,
23			blockers:" and "We believe that the majority of" of	priorities, and internal strategy relating to advertising on Meta's products, including
23			"January 30, 2019 at 10:10	with respect to specific advertisers or
24			PM" email	specific types of advertisers. If publicly
25				revealed, this information could cause Meta competitive harm by giving other
				parties insight into Meta's strategic
26				considerations and thus a competitive
27				advantage over Meta in ongoing or future
28	No. 2:20	ov 00570 ID	100	business negotiations.
_3	No. 3:20-	cv-08570-JD	-166-	DECL. OF AMRISH ACHARYA ISO OMNIBUS

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND DAUBERT BRIEFING

1	297	892-13	PALM-014546139, between "From my side, I think the	This text contains non-public and confidential information regarding risks,
2			main issues are:" and "In terms of performance" of	priorities, and internal strategy relating to advertising on Meta's products, including
3			"January 30, 2019 at 1:37 PM" email	with respect to specific advertisers or specific types of advertisers. If publicly
4			1 W Cilian	revealed, this information could cause
5				Meta competitive harm by giving other parties insight into Meta's strategic
6				considerations and thus a competitive
7				advantage over Meta in ongoing or future business negotiations.
8	A			nt Meta Platforms, Inc.'s Motion for
		T T	mary Judgment, Exhibit 96, PX	5 1
9	298	892-13	Entire document	This document describes proprietary market research and analysis on a Meta
10				competitor. This text contains non-public
11				and confidential information regarding Meta's agreements with an advertiser as
12				well as internal strategy relating to those
13				agreements. Disclosure of this non-public information is likely to result in
14				competitive harm to Meta, as it reveals strategic decision-making which, for
15				example, could give an advertiser unfair
16				leverage in competing against or negotiating with Meta. Moreover, Meta's
				competitors could use this non-party
17				information to unfairly target Meta's advertisers and offer specific deal terms
18				designed to undercut those offered by
19				Meta.
20				
21				
22				
23				

24

25

26

Advertise	* *	efendant Meta Platforms, Inc.'s Motion for lgment, Exhibit 97
299 892-13	Entire document	This document details confidential, non-public information regarding Meta's internal business strategies and analyses including summaries and discussions of Meta's internal modeling and assessments of its products, services, or advertising platform that reveal competitively sensitive information, including how users or advertisers use and value Meta's products, services, or advertising platform, how they operate, and potential improvements or other product changes. Disclosure of this non-public information is likely to result in competitive harm to Meta, as it reveals strategic decision-making which, for example, could give a developer, advertiser, or business partner unfair leverage in competing against or negotiating with Meta.
Advertise		efendant Meta Platforms, Inc.'s Motion for
	<u> </u>	lgment, Exhibit 99
300 892-13	Entire document	This document describes potential changes in product functionality. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and delivery systems. This information has never been disclosed publicly and Meta's product team treats as strictly confidential. If publicly revealed, this information could influent the competitive decision-making and

A		laintiffs' Opposition to Defenda mmary Judgment, Exhibit 100,	nt Meta Platforms, Inc.'s Motion for PX-119 Parikh Deposition
301	892-13	Entire document	This document describes technical aspects of Meta's infrastructure. This information contains confidential, proprietary, and commercially sensitive information regarding the technical functionalities and processes of Meta's ad targeting and content delivery systems. This information has never beed disclosed publicly and Meta's product team treats it as strictly confidential. If publicly revealed, this information could influence the competitive decisionmaking and business strategies employed by Meta's competitors in advertising.
Advertiser Plaintiffs' Opposition to Defendant Meta Platforms, Inc.'s Motion for			
11	avertiger 1	Summary Judgment	
302	892-14	2, between "specific in-app analytics—" and "—that he believed it would be"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.
303	892-14	3, image snip between "You should figure out how to do this" and "PALM-016564836"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.

No. 3:20-cv-08570-JD

1	304	892-14	3, image snip between "This	This text details the strategy and
_			is really important" and "/ or	proprietary sources and methods for
2			let us install a really heavy"	gathering market research. This
2				information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive analysis, including proprietary methods
5				for obtaining that data or conducting that
				research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This
7				information has never been disclosed
8				publicly and Meta's product team treats it
				as strictly confidential. If publicly revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
10				competitors, for example by influencing
11				how those competitors conduct market
				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
1.5				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could
				influence the competitive decision-
17				making and business strategies employed by Meta's competitors, for example by
18				influencing how those competitors
10				conduct market research and how they
19				distinguish themselves from Meta.
20		1	1	
23				
21				

22

23

24

25

26

1	305	892-14	6, image snip between	This text details the strategy and
2			"specialized tools (like Wireshark)" and "PX 414 at	proprietary sources and methods for gathering market research. This
2			1"	information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
				analysis, including proprietary methods for obtaining that data or conducting that
5				research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This
7				information has never been disclosed publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
				the competitive decision-making and
10				business strategies employed by Meta's competitors, for example by influencing
11				how those competitors conduct market
10				research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential
14				research regarding competitive analysis. This information has never been
14				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could
				influence the competitive decision- making and business strategies employed
17				by Meta's competitors, for example by
18				influencing how those competitors
19				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
22				
23				
24				
25				

No. 3:20-cv-08570-JD

26

27

1	306	892-14	7, image between	This text details the strategy and
			"companies' valuable analytics. <i>Id</i> ." and "PX 414 at	proprietary sources and methods for
2			6"	gathering market research. This information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
5				analysis, including proprietary methods for obtaining that data or conducting that
3				research, and proprietary, confidential
6				research into potential methodologies for
7				conducting market research. This information has never been disclosed
8				publicly and Meta's product team treats it
9				as strictly confidential. If publicly revealed, this information could influence
10				the competitive decision-making and business strategies employed by Meta's
10				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
				themselves from Meta. This information
13				contains nonpublic and confidential research regarding competitive analysis.
14				This information has never been
1.5				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could influence the competitive decision-
17				making and business strategies employed
1 /				by Meta's competitors, for example by
18				influencing how those competitors
19				conduct market research and how they
20				distinguish themselves from Meta.
21				
22				
23				
24				
25				
26				

No. 3:20-cv-08570-JD

27

1	307	892-14	11, left image snip between "Sending message" and "We	This text details the strategy and proprietary sources and methods for
2			used it to measure"	gathering market research. This
2			used it to incasure	information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive analysis, including proprietary methods
5				for obtaining that data or conducting that
6				research, and proprietary, confidential research into potential methodologies for
				conducting market research. This
7				information has never been disclosed
8				publicly and Meta's product team treats it as strictly confidential. If publicly
9				revealed, this information could influence
10				the competitive decision-making and business strategies employed by Meta's
10				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
12				themselves from Meta. This information contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product team treats it as strictly confidential. If
				publicly revealed, this information could
16				influence the competitive decision-
17				making and business strategies employed
18				by Meta's competitors, for example by influencing how those competitors
				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
22				
22				

23

24

25

26

1	308	892-14	11, right image snip between	This text details the strategy and
2			"video_type (ad or content)" and "PX 1205 at 2-3	proprietary sources and methods for gathering market research. This
			(Snapchat); id. at 2	information contains nonpublic and
3			(YouTube)"	confidential research regarding app performance data and competitive
4				analysis, including proprietary methods
5				for obtaining that data or conducting that research, and proprietary, confidential
6				research into potential methodologies for conducting market research. This
7				information has never been disclosed publicly and Meta's product team treats it
8				as strictly confidential. If publicly
9				revealed, this information could influence
10				the competitive decision-making and business strategies employed by Meta's
				competitors, for example by influencing
11				how those competitors conduct market research and how they distinguish
12				themselves from Meta. This information
13				contains nonpublic and confidential research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product
				team treats it as strictly confidential. If publicly revealed, this information could
16				influence the competitive decision-
17				making and business strategies employed by Meta's competitors, for example by
18				influencing how those competitors
19				conduct market research and how they distinguish themselves from Meta.
20				distinguish themselves from weta.
21				
22				
23				
24				

25

26

1	309	892-14	11, image between "PX 1205 at 2-3 (Snapchat); id. at 2	This text details the strategy and proprietary sources and methods for
2			(YouTube)" and "PX 1205 at	gathering market research. This
			3"	information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive analysis, including proprietary methods
5				for obtaining that data or conducting that
3				research, and proprietary, confidential
6				research into potential methodologies for conducting market research. This
7				information has never been disclosed
8				publicly and Meta's product team treats it as strictly confidential. If publicly
9				revealed, this information could influence
				the competitive decision-making and
10				business strategies employed by Meta's competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish
				themselves from Meta. This information contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
15				disclosed publicly and Meta's product team treats it as strictly confidential. If
				publicly revealed, this information could
16				influence the competitive decision-
17				making and business strategies employed
18				by Meta's competitors, for example by influencing how those competitors
				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
22				
23				
24				
25				

26

1	310	892-14	14, image above "Id. at 3"	This text details the strategy and proprietary sources and methods for
2				gathering market research. This
				information contains nonpublic and
3				confidential research regarding app
4				performance data and competitive
				analysis, including proprietary methods for obtaining that data or conducting that
5				research, and proprietary, confidential
6				research into potential methodologies for
				conducting market research. This
7				information has never been disclosed
8				publicly and Meta's product team treats it
				as strictly confidential. If publicly revealed, this information could influence
9				the competitive decision-making and
10				business strategies employed by Meta's
				competitors, for example by influencing
11				how those competitors conduct market
12				research and how they distinguish themselves from Meta. This information
10				contains nonpublic and confidential
13				research regarding competitive analysis.
14				This information has never been
1.5				disclosed publicly and Meta's product
15				team treats it as strictly confidential. If
16				publicly revealed, this information could influence the competitive decision-
1.7				making and business strategies employed
17				by Meta's competitors, for example by
18				influencing how those competitors
10				conduct market research and how they
19				distinguish themselves from Meta.
20				
21				
<i>L</i> 1				

22

23

24

25

26

	Defendant Meta Platforms, Inc.'s Reply in Support of Motion to Exclude Expert Festimony and Opinions of Tilman Klumpp, Exhibit 3, Excerpts of Expert Merits Report of Tilman Klumpp, Ph.D., dated Jan. 12, 2024					
311	901-2	77 ¶ 151, between "others at Facebook, writing:" and "In the same e-mail, Ms. Chang advised that;" between "In the same e-mail, Ms. Chang advised that" and "Ms. Chang testified that;" and after "Zuckerberg on April 30, 2014"	This information contains non-public information regarding Meta's confidential non-public internal strategic considerations related to creating value for and attracting users or advertisers to Meta's products or services. This information has never been disclosed publicly. Disclosure of this information would adversely impact Meta's current competitive position by enabling Meta's competitors to mimic its confidential strategies in an effort to attract users or advertisers away from Meta.			
312	901-2	84 ¶ 167 n.360, between "at 266" and "PALM-ADI-0001000836-837"	This text contains confidential, non-public information regarding a non-party developer, advertiser, or business partner and implicates the nonparty's confidentiality interests, by revealing the identity of a Meta developer, advertiser, or business partner who is not a party to this litigation, and who has a reasonable expectation that Meta will maintain the confidentiality of contractual terms and its own confidential statements made during negotiations. Further, disclosure of this non-public information is likely tresult in competitive harm to Meta, as it reveals strategic decision-making, which for example, could give a competitor or potential business partner unfair leverage in competing against or negotiating with Meta. Moreover, Meta's competitors could use this non-party information to unfairly target Meta's developer, advertiser, or business partner.			

	Defendant Meta Platforms, Inc.'s Reply in Support of Motion to Exclude Expert						
1		Testimony and Opinions of Tilman Klumpp, Exhibit 4, Excerpts of Transcript of					
2	Deposition of Tilman Klumpp, held on Mar. 5, 2024 313 901-3 289:7, between "irrational for This information reflects and						
3	313	901-3	Facebook to" and "in to	calculated from internal, non-public Meta			
4			make that decision"	financial data. Were this information to			
4				be publicly revealed, it could cause Meta			
5				competitive harm by giving competitors insight into confidential Meta financial information.			
6	Defer	ndant Mata	Platforms Inc 's Ronly in Sun	port of Motion for Summary Judgment			
7	Regar	ding First	Amended Consolidated Adverti	iser Class Action Complaint, Exhibit 12,			
8				A. Williams, Ph.D., dated Aug. 5, 2024			
	314	903-2	92-93 ¶ 235, image between	This information reflects and is			
9			"OVER TIME IN THE U.S."	calculated from internal, non-public Meta financial data. Were this information to			
10			and "Source: PALM- 014824975"	be publicly revealed, it could cause Meta			
11				competitive harm by giving competitors insight into confidential Meta financial			
12				information.			
				port of Motion for Summary Judgment			
13				iser Class Action Complaint, Exhibit 15,			
14	315	903-5	277:16-18, between	man Klumpp, held on Mar. 5, 2024 This text describes specific contract			
15	313	703 3	"Microsoft agreement that	terms between Meta and app developers.			
			says that" and " Well, there is	This text contains confidential, non-			
16			so this"	public information regarding a non-party			
17				developer. Disclosure of this non-public information is likely to result in			
18				competitive harm to Meta, as it reveals			
19				strategic decision-making, which, for example, could give a competitor or			
20				potential business partner unfair leverage in competing against or negotiating with			
21				Meta. Moreover, Meta's competitors			
22				could use this non-party information to unfairly target Meta's developers.			
23	316	903-5	289:7, between "irrational for Facebook to" and "in to	This information reflects and is			
			make that decision"	calculated from internal, non-public Meta financial data. Were this information to			
24				be publicly revealed, it could cause Meta			
25				competitive harm by giving competitors insight into confidential Meta financial			
26				information.			
- 11							

1		
2	I declare that the foregoing is true and correct under	r nenalty of neriury.
3	Executed on this day of March, 2025, in	
4	,,	
5		
6		
7		Amrish Adharya
8		Amrish Acharya
9		•
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27	No. 3:20-cv-08570-JD	DECL. OF AMRISH ACHARYA ISO OMNIBUS
28		MOT. TO SEAL MATERIALS SUBMITTED IN

Docusign Envelope ID: ACCEPTE 78:1045-4865-9739-376568C-D68334ment 909-1 Filed 03/14/25 Page 180 of 181

CONNECTION WITH SUMMARY JUDGMENT AND DAUBERT BRIEFING

No. 3:20-cv-08570-JD

DECL. OF AMRISH ACHARYA ISO OMNIBUS MOT. TO SEAL MATERIALS SUBMITTED IN CONNECTION WITH SUMMARY JUDGMENT AND DAUBERT BRIEFING